

## **EXHIBIT 2**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

\*\*\*\*\*

Case No.  
IN RE: SOCIAL MEDIA ADOLESCENT 4:22-MD-03047-YGR  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

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This Document Relates To:

Tucson Unified School District  
v. Meta Platforms Inc., et a  
Case No. 4:24-cv-1382

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CONTINUED VIDEOTAPED 30(b)(6)  
DEPOSITION OF  
TUCSON UNIFIED SCHOOL DISTRICT  
by and through  
JULIE A. SHIVANONDA

Held At: JW Marriott Tucson  
Starr Pass Resort & Spa  
3800 W. Starr Pass Blvd  
Tucson, Arizona

April 9th, 2025  
9:07 a.m.

Reported By:  
MAUREEN O. POLLARD, CA CSR #14449, RDR

<p style="text-align: right;">Page 196</p> <p>1</p> <p>2</p> <p>3 Continued Videotaped 30(b)(6)</p> <p>4 Deposition of TUCSON UNIFIED SCHOOL DISTRICT by</p> <p>5 and through JULIE A. SHIVANONDA, held at JW</p> <p>6 Marriott Tucson Starr Pass Resort &amp; Spa, 3800 W.</p> <p>7 Starr Pass Blvd., Tucson, Arizona, commencing at</p> <p>8 9:07, on the 9th of April, 2025, before Maureen</p> <p>9 O'Connor Pollard, Registered Diplomate Reporter,</p> <p>10 Realtime Systems Administrator, California CSR</p> <p>11 #14449.</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 198</p> <p>1 APPEARANCES (Continued):</p> <p>2</p> <p>3 ON BEHALF OF SNAP, INC.:</p> <p>4 MUNGER, TOLLES &amp; OLSON</p> <p>5 350 South Grand Avenue, 50th Floor</p> <p>6 Los Angeles, California 90071-3426</p> <p>7 213-683-9516</p> <p>8 BY: VICTORIA A. DEGTAREVA, ESQ.</p> <p>9 victoria.degtareva@mto.com</p> <p>10 BY: ROWLEY RICE, ESQ.</p> <p>11 rowley.rice@mto.com</p> <p>12 BY: MOHAMED SAID, ESQ. (Zoom)</p> <p>13 mohamed.said@mto.com</p> <p>14 and</p> <p>15 MUNGER, TOLLES &amp; OLSON</p> <p>16 601 Massachusetts Avenue NW</p> <p>17 Suite 500E</p> <p>18 Washington, DC 20001</p> <p>19 202-220-1126</p> <p>20 BY: STEPHANY REAVES, ESQ. (Zoom)</p> <p>21 stephany.reaves@mto.com</p> <p>22</p> <p>23 ON BEHALF OF ALPHABET INC., GOOGLE LLC,</p> <p>24 and YOUTUBE, LLC:</p> <p>25</p> <p>WILLIAMS &amp; CONNOLLY LLP</p> <p>630 Maine Avenue, S.W.</p> <p>Washington, DC 20024</p> <p>202-434-5380</p> <p>BY: ARMANI MADISON, ESQ. (Zoom)</p> <p>amadison@wc.com</p> <p>Also Present:</p> <p>Videographer and Trial Tech: Dan Lawlor</p>
<p style="text-align: right;">Page 197</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 ON BEHALF OF THE PLAINTIFFS:</p> <p>4 WAGSTAFF &amp; CARTMELL</p> <p>5 4740 Grand Avenue, Suite 300</p> <p>6 Kansas City, Missouri 64112</p> <p>7 816-701-1145</p> <p>8 BY: MICHAEL P. CUTLER, ESQ.</p> <p>9 mcutler@wcllp.com</p> <p>10</p> <p>11 ON BEHALF OF META PLATFORMS, INC. f/k/a</p> <p>12 FACEBOOK, INC.; FACEBOOK HOLDINGS, LLC;</p> <p>13 INSTAGRAM, LLC; FACEBOOK PAYMENTS, INC.;</p> <p>14 FACEBOOK OPERATIONS, LLC; FACEBOOK TECHNOLOGIES,</p> <p>15 LLC; SICULUS, INC.; and MARK ELLIOT ZUCKERBERG:</p> <p>16 SHOOK, HARDY &amp; BACON LLP</p> <p>17 2555 Grand Boulevard</p> <p>18 Kansas City, Missouri 64108</p> <p>19 816-474-6550</p> <p>20 BY: DANA STRUEBY, ESQ.</p> <p>21 dstrueby@shb.com</p> <p>22 BY: COURTNEY C. BURRESS, ESQ. (Zoom)</p> <p>23 cburress@shb.com</p> <p>24</p> <p>25 ON BEHALF OF DEFENDANTS TIKTOK, LTD.; TIKTOK,</p> <p>LLC; TIKTOK INC.; BYTEDANCE LTD.; and BYTEDANCE</p> <p>INC.:</p> <p>KING &amp; SPALDING LLP</p> <p>1100 Louisiana Street, Suite 4100</p> <p>Houston, Texas 77002</p> <p>713-751-3200</p> <p>BY: MANDIE M. CASH, ESQ. (Zoom)</p> <p>mcash@kslaw.com</p>	<p style="text-align: right;">Page 199</p> <p>1 INDEX</p> <p>2 EXAMINATION PAGE</p> <p>3 JULIE A. SHIVANONDA</p> <p>4 BY MS. DEGTAREVA 205</p> <p>5 BY MR. MADISON 374</p> <p>6</p> <p>7</p> <p>8 EXHIBITS</p> <p>9 NO. DESCRIPTION PAGE</p> <p>10 Tucson-30(b)(6)- The Code of Conduct,</p> <p>Shivanonda-21 Tucson Unified School</p> <p>11 District, Revised 2024.. 207</p> <p>12 Tucson-30(b)(6)- Excel spreadsheet,</p> <p>Shivanonda-22 Bates SM_TUSD_00365959.. 214</p> <p>13</p> <p>14 Tucson-30(b)(6)- Suicide Prevention</p> <p>Shivanonda-23 Legislation 2021-2023,</p> <p>Bates SM_TUSD_00012629</p> <p>15 through 12641..... 250</p> <p>16 Tucson-30(b)(6)- Document titled</p> <p>Shivanonda-24 Enduring Change Plan</p> <p>17 Mini-grant Cover</p> <p>Sheet, 11/4/2016,</p> <p>18 Bates SM_TUSD_00359040</p> <p>through 9055..... 252</p> <p>19</p> <p>20 Tucson-30(b)(6)- E-mail chain, Bates</p> <p>Shivanonda-25 SM_TUSD_00007902</p> <p>through 7904..... 259</p> <p>21</p> <p>22 Tucson-30(b)(6)- Document titled</p> <p>Shivanonda-26 School-Based Mental</p> <p>Health Services Grant</p> <p>Program Tucson Unified</p> <p>23 School District, Bates</p> <p>SM_TUSD_00020360</p> <p>24 through 362..... 264</p> <p>25</p>

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<p style="text-align: right;">Page 205</p> <p>1       P R O C E E D I N G S</p> <p>2</p> <p>3       THE VIDEOGRAPHER: We are now on the</p> <p>4   record. My name is Dan Lawlor, I'm a</p> <p>5   videographer with Golkow, a Veritext</p> <p>6   division.</p> <p>7       Today's date is April 9, 2025, and</p> <p>8   the time is 9:07 a.m.</p> <p>9       This is the continuing deposition of</p> <p>10   Julie Shivanonda, 30(b)(6).</p> <p>11      Ms. Shivanonda, I remind you you're</p> <p>12   under oath from yesterday.</p> <p>13      Counsel, please proceed.</p> <p>14      * * *</p> <p>15   Whereupon,</p> <p>16      JULIE A. SHIVANONDA,</p> <p>17   having been previously duly sworn to testify to</p> <p>18   the truth, the whole truth, and nothing but the</p> <p>19   truth, was examined and testified further as</p> <p>20   follows:</p> <p>21       EXAMINATION</p> <p>22   CONTINUED BY MS. DEGTYAREVA:</p> <p>23   Q.   Good morning, Ms. Shivanonda.</p> <p>24   A.   Good morning.</p> <p>25   Q.   Do you understand that you're still</p>	<p style="text-align: right;">Page 207</p> <p>1   A.   I see that.</p> <p>2   Q.   Is that consistent with your</p> <p>3   understanding?</p> <p>4   A.   I am not fully aware of all of the</p> <p>5   information that was utilized to complete this</p> <p>6   document, so outside of potentially any other,</p> <p>7   that would be my understanding as it's written,</p> <p>8   yes.</p> <p>9   Q.   Okay. So as far as you understand,</p> <p>10   this is an accurate answer?</p> <p>11   A.   Yes.</p> <p>12   Q.   You can set that aside.</p> <p>13       Now, you testified earlier in the</p> <p>14   deposition that TUSD has a code of conduct, is</p> <p>15   that right?</p> <p>16   A.   Correct.</p> <p>17      MS. DEGTYAREVA: Can we please mark</p> <p>18   as Exhibit 21 tab 6?</p> <p>19       (Tucson-30(b)(6)-Shivanonda-21 was</p> <p>20   marked for identification.)</p> <p>21   BY MS. DEGTYAREVA:</p> <p>22   Q.   Ms. Shivanonda, do you recognize</p> <p>23   this document?</p> <p>24   A.   This appears to be The Code of</p> <p>25   Conduct for TUSD.</p>

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<p style="text-align: right;">Page 208</p> <p>1 Q. And at the very bottom of the first 2 page it says "Revised 2024," is that right? 3 A. That is what it says, yes. 4 Q. And I believe you testified earlier 5 that TUSD tracks violations of the code of 6 conduct in a database called Synergy, is that 7 right? 8 A. Correct. 9 Q. So is every violation of the code of 10 conduct that TUSD is aware of required to be 11 reported in Synergy? 12 A. Depending upon the level of 13 severity. So there may or may not be instances 14 that may not rise to the level within the code, 15 so that may or may not be reported. Discipline 16 reports are reported if there -- if they rise to 17 the level of the code of conduct, yes. 18 Q. And so if something -- well, let me 19 just make sure I understand. 20 So if something is a violation of 21 the code of conduct, it would be reported in 22 Synergy, is that right? 23 MR. CUTLER: Object to form. 24 THE WITNESS: Overall. So it's 25 very -- the way that school districts</p>	<p style="text-align: right;">Page 210</p> <p>1 rise to a certain level would be recorded in 2 Synergy. 3 Anywhere else where there might be a 4 recording of a violation of the code of conduct? 5 MR. CUTLER: Object to form. 6 THE WITNESS: Those are our two main 7 platforms. With 4,000 certified teachers, 8 I can't guarantee 100 percent fidelity if 9 they are documenting in any personal, but 10 the expectation is that discipline 11 behavior interventions are documented in 12 Synergy, correct. 13 BY MS. DEGTYAREVA: 14 Q. And who enters the reports into 15 Synergy? 16 A. It depends on which report you're 17 speaking of. 18 Q. Who enters the discipline reports 19 into Synergy? 20 A. So if it is a discipline that meets 21 the requirements of the code of conduct, the 22 administrators on campus. So some of our 23 schools may have a dean of students, and they 24 are able to do discipline at level 1 and 2 in 25 the code of conduct, so they might report. And</p>
<p style="text-align: right;">Page 209</p> <p>1 work, it's very difficult just because of 2 documentation. I would say not everything 3 always gets documented when we have a 4 teacher with 35 kids in a class, so things 5 sometimes get missed. 6 Oftentimes it's also discretion. So 7 if a teacher works with a student and 8 maybe it's considered a level 1, they 9 might have conversations with students 10 prior to, but then oftentimes they would 11 document that in the MTSS Synergy 12 dashboard. And then if things were 13 ongoing, then it may turn into a 14 discipline incident, yes. 15 But there may be times where 16 explicit discipline incidents may not be 17 recorded just with the level and the 18 nature of the amount of behavior, the lack 19 of staffing. So I could not say for sure 20 that absolutely everything would be 21 documented into Synergy. 22 BY MS. DEGTYAREVA: 23 Q. So a conversation relating to a 24 violation might be recorded in the MTSS Synergy 25 dashboard, and then some -- or violations that</p>	<p style="text-align: right;">Page 211</p> <p>1 then assistant principals and administrators 2 would -- any levels 3 and above, they would be 3 the ones reporting it in Synergy. 4 Q. And so when the administrators are 5 reporting it, do they get their information from 6 the teachers? 7 A. There -- 8 MR. CUTLER: Object to form. 9 THE WITNESS: Okay. So there's 10 generally investigations that happen. So 11 for every discipline incident there's 12 generally several steps that need to be 13 taken, especially because we follow the 14 due process of all of our students. 15 And so the administrator would have 16 conversations with teachers, they would 17 have conversations with the student, 18 potentially investigate any other 19 potential witnesses, so it could be a 20 myriad of people. Could be other staff 21 members that may have been involved or 22 seen an incident, could be a report from a 23 parent, so there could be a multitude of 24 individuals that would be involved in 25 those conversations.</p>

<p style="text-align: right;">Page 212</p> <p>1 BY MS. DEGTYAREVA:</p> <p>2 Q. How are all of those investigative</p> <p>3 steps documented?</p> <p>4 A. It --</p> <p>5 MR. CUTLER: Object to form.</p> <p>6 THE WITNESS: So that would vary</p> <p>7 from site to site. The district</p> <p>8 expectation is that administrators do</p> <p>9 their due diligence based on due process</p> <p>10 to identify the information surrounding a</p> <p>11 discipline incident.</p> <p>12 It's the expectation that the</p> <p>13 majority of that should occur in the</p> <p>14 Synergy discipline system. However, I</p> <p>15 cannot speak to -- we have over 200</p> <p>16 administrators in our district so I cannot</p> <p>17 speak to exactly how they all quantify</p> <p>18 their information in those investigations.</p> <p>19 BY MS. DEGTYAREVA:</p> <p>20 Q. So just to make sure I understand</p> <p>21 your testimony, the expectation at least is that</p> <p>22 the administrators would record whatever</p> <p>23 investigation they did and the result of that</p> <p>24 investigation in the Synergy database.</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 214</p> <p>1 interventions that may occur from an</p> <p>2 investigation, might be then in our MTSS</p> <p>3 system.</p> <p>4 BY MS. DEGTYAREVA:</p> <p>5 Q. Got it.</p> <p>6 MS. DEGTYAREVA: Let's mark as</p> <p>7 Exhibit 22 tab 24.</p> <p>8 (Tucson-30(b)(6)-Shivanonda-22 was</p> <p>9 marked for identification.)</p> <p>10 BY MS. DEGTYAREVA:</p> <p>11 Q. And tab 24 is another -- we're going</p> <p>12 to be giving you the slip sheet. This is</p> <p>13 another large Excel so we're going to just pull</p> <p>14 up the Excel on the screen.</p> <p>15 And while we're pulling that up, if</p> <p>16 you can take a look at the metadata sheet that</p> <p>17 we just handed to you for this exhibit, you'll</p> <p>18 see under All Custodians it says, "Synergy."</p> <p>19 Do you see that?</p> <p>20 A. I do see that.</p> <p>21 Q. And then under File Name do you see</p> <p>22 it says, "Violations by year grade"?</p> <p>23 A. I see that, yes.</p> <p>24 Q. Okay. Okay. Here we go. So you</p> <p>25 see on the screen, is this a spreadsheet that's</p>
<p style="text-align: right;">Page 213</p> <p>1 Q. And so the discipline reports</p> <p>2 contained in Synergy, do those include only</p> <p>3 allegations that have been substantiated after</p> <p>4 the investigation was complete?</p> <p>5 MR. CUTLER: Object to form.</p> <p>6 THE WITNESS: If there is a</p> <p>7 disciplinary infraction and there's</p> <p>8 discipline that has been given to a</p> <p>9 student, that would be documented in the</p> <p>10 discipline platform, yes.</p> <p>11 BY MS. DEGTYAREVA:</p> <p>12 Q. And so if an administrator conducts</p> <p>13 an investigation and determines that there's not</p> <p>14 enough evidence to substantiate the violation,</p> <p>15 would that be documented anywhere?</p> <p>16 MR. CUTLER: Object to form.</p> <p>17 THE WITNESS: That would potentially</p> <p>18 be documented; not necessarily if there's</p> <p>19 no discipline handed out, then it wouldn't</p> <p>20 be in the discipline system. That might</p> <p>21 be within the administrator's documents,</p> <p>22 and then they might then have</p> <p>23 conversations with other support staff to</p> <p>24 identify potential interventions. Some of</p> <p>25 that may then be documented of any other</p>	<p style="text-align: right;">Page 215</p> <p>1 generated from the Discipline tab of Synergy?</p> <p>2 MR. CUTLER: Object to form.</p> <p>3 THE WITNESS: So I have not seen</p> <p>4 this exact Excel spreadsheet, but from</p> <p>5 looking at it, it does appear as though</p> <p>6 this would be data from Synergy.</p> <p>7 BY MS. DEGTYAREVA:</p> <p>8 Q. When you export data from Synergy,</p> <p>9 do you know if it usually appears in this form,</p> <p>10 or would an export from Synergy look different</p> <p>11 in your experience?</p> <p>12 A. The Synergy system, when schools</p> <p>13 access their particular data, there are specific</p> <p>14 reports that they pull directly from Synergy</p> <p>15 that would look a little bit different than this</p> <p>16 Excel spreadsheet.</p> <p>17 Q. And when the schools pull those</p> <p>18 reports from Synergy, what fields do they</p> <p>19 contain? What data fields do they contain?</p> <p>20 MR. CUTLER: Object to form.</p> <p>21 THE WITNESS: I couldn't speak. We</p> <p>22 have hundreds of reports that are</p> <p>23 available in Synergy, so it really just</p> <p>24 depends on what the administrator is</p> <p>25 looking for, whether they're looking for</p>

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<p style="text-align: right;">Page 216</p> <p>1 specifics around a specific discipline  2 type, whether it's a year, whether it's  3 year over year. There's a multitude of  4 reports that they may pull to...</p> <p>5 BY MS. DEGTYAREVA:  6 Q. So based on your experience is it  7 possible to pull -- to kind of choose whatever  8 fields you want in Synergy and then pull the  9 report that shows whatever field you're  10 interested in?</p> <p>11 A. For the most part our technology  12 team, they work closely with Synergy to create  13 reports, and then if there is a report that's  14 not available, then they can potentially look  15 into seeing if it's something that could be  16 created if it's a need.</p> <p>17 Q. Got it.  18 Now, in this spreadsheet there's a  19 column titled Violation_category, and does that  20 identify the type of violation of the code of  21 conduct that's at issue?</p> <p>22 A. Again, I didn't create this  23 spreadsheet, so from my understanding with just  24 looking at it at face value, that does appear to  25 match violation categories in the code of</p>	<p style="text-align: right;">Page 218</p> <p>1 BY MS. DEGTYAREVA:  2 Q. -- to connect students' use of  3 social media and resulting harms?</p> <p>4 MR. CUTLER: Sorry. Object to form.  5 THE WITNESS: I'm unable to again  6 see the entire spreadsheet, but again at  7 face value it looks as though these are  8 the violations from Synergy discipline  9 data, so this would be a potential tool  10 that may be used.</p> <p>11 BY MS. DEGTYAREVA:  12 Q. So this spreadsheet -- and I can  13 represent to you that the only columns in this  14 spreadsheet are for Violation_Category, Grade,  15 and # of Incidents. This spreadsheet doesn't  16 say anything about social media, right?</p> <p>17 MR. CUTLER: Object to form.  18 Do you want to look at --  19 THE WITNESS: Can you --</p> <p>20 BY MS. DEGTYAREVA:  21 Q. Yeah, you can scroll --  22 A. Can we scroll down?  23 Q. You can scroll down and scroll over.  24 A. So there is -- okay. If you want to  25 stop. Okay.</p>
<p style="text-align: right;">Page 217</p> <p>1 conduct.</p> <p>2 Q. And then going to the next column  3 that says Grade, does that appear to be the  4 applicable school grade?</p> <p>5 A. It does, yes.</p> <p>6 Q. And then going over to the next  7 column, the Numbers of Incidents, does that  8 appear to be the number of incidents that  9 occurred for that type of violation for that  10 grade level in a particular year?</p> <p>11 A. Based on face value of the Excel  12 spreadsheet, it does look as though that's what  13 that would look like.</p> <p>14 Q. So several times earlier in the  15 deposition you've testified that you look at or  16 rely on discipline data for information about  17 students' use of social media and how that  18 results in harms or violations. Is that  19 accurate?</p> <p>20 A. I believe that was my testimony,  21 yes.</p> <p>22 Q. So does this spreadsheet contain all  23 of that discipline data that you were testifying  24 about --</p> <p>25 MR. CUTLER: Object to form.</p>	<p style="text-align: right;">Page 219</p> <p>1 So within the spreadsheet I do see  2 violations of improper use of technology, which  3 I have stated before is one of the explicit  4 categories of violation that we would connect.</p> <p>5 However, looking at this, when we  6 look at data it's not necessarily as black and  7 white as numbers on a spreadsheet, so, again,  8 what I talked about before, kind of the idea of  9 soft data of when we have conversations. So  10 this would just be the overall number, and then  11 potentially do a deeper dive into some more of  12 the verbiage in discipline.</p> <p>13 I can tell you from my  14 understanding, at just looking at all of these  15 and then in the conversations with  16 administrators, again, they talk with their  17 regional superintendents and then Ms. Anna  18 Warmbrand in student relations, they talk about  19 what the offenses are, and so for the majority  20 of these a lot of the sexual offenses would also  21 have a tie to social media.</p> <p>22 So there may be an explicit visual  23 that was either seen or posted on a social media  24 site. Obviously the improper use of technology  25 is more explicit. In fact, we've seen a high</p>

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<p style="text-align: right;">Page 220</p> <p>1 number of students having their cellphones  2 stolen from school, so the theft could have been  3 that.  4 The threats and the aggression, we  5 did see a high number of threats also occurring  6 via the use of social media.  7 So at first glance, just looking at  8 these numbers, no, we can't necessarily, but, I  9 mean, it's in the details as we continue to look  10 at these and then have conversations around what  11 is actually happening in our schools, and the  12 majority of these offenses do have some causal  13 link or direct tie to a social media platform of  14 some sort.  15 Q. And those details, you have to look  16 at again the other information in Synergy, that  17 narrative section that explains further details  18 of the violation to see if it had a link to  19 social media?  20 MR. CUTLER: Object to form.  21 THE WITNESS: Yes, that would be one  22 place, and then again through those  23 conversations.  24 BY MS. DEGTAREVA:  25 Q. Okay. Now, you talked about</p>	<p style="text-align: right;">Page 222</p> <p>1 Network Violations, is that right?  2 A. Yes, that is correct.  3 Q. So that would include things like  4 copyright infringement?  5 A. That would, yes.  6 Q. Vandalism of computers would be  7 included?  8 A. Yes.  9 Q. Using computer network for  10 non-instructional purposes, right?  11 A. Yes, that is what that says.  12 Q. Okay. So this category of improper  13 use of technology seems to kind of be a catchall  14 technology and computer violation category,  15 right?  16 MR. CUTLER: Object to form.  17 THE WITNESS: I'm not sure that I  18 would categorize it that, but it does  19 include a wide variety of discipline  20 actions that we see on our school  21 campuses, yes.  22 BY MS. DEGTAREVA:  23 Q. Does the TUSD code of conduct  24 include any other category that is just about  25 cellphone use?</p>
<p style="text-align: right;">Page 221</p> <p>1 improper use of technology as one violation that  2 you say is explicitly tied to social media.  3 Let's go back to Exhibit 21, which  4 is The Code of Conduct. And let's look at, I  5 believe it's page 24.  6 So this describes this improper use  7 of technology violation, right?  8 A. This is the code of conduct that  9 does describe that, yes.  10 Q. And so improper use of technology  11 includes possession of cellphones or other  12 electronic devices in violation of TUSD policy,  13 right?  14 A. Correct.  15 Q. And so that would include things  16 like using a cellphone during class, right?  17 A. Correct.  18 Q. It would also include things like,  19 as you mentioned, posting videos of fights onto  20 social media or posting images of school  21 community members in a manner intended to cause  22 harm to another person, right?  23 A. Correct.  24 Q. And then improper use of technology  25 also includes a category called Computer or</p>	<p style="text-align: right;">Page 223</p> <p>1 A. This would be -- and I haven't  2 memorized the entire code of conduct.  3 MR. CUTLER: Do you want to review  4 it first?  5 BY MS. DEGTAREVA:  6 Q. Are you aware of any other category  7 that specifically -- or that's just about  8 cellphone use and not other types of improper  9 use of technology?  10 MR. CUTLER: Do you want to review  11 it first?  12 THE WITNESS: Sure. Yeah.  13 MR. CUTLER: Okay.  14 (Witness reviewing document.)  15 THE WITNESS: So if you take a look  16 at the overarching, there are several  17 where telecommunication device may be also  18 noted.  19 So such as threat or intimidation,  20 intimidation that occurs online or through  21 a telecommunication device, that also is  22 that connect there.  23 Bullying also -- cyberbullying is  24 also noted in there. Pornography viewing.  25 Sexual explicit or obscene depictions in</p>

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<p style="text-align: right;">Page 224</p> <p>1 person, words, or images, and also 2 including from books, electronic devices. 3 Let's see, where else did I see? So 4 in several of these there are overall 5 connections. 6 And then again when we talked about 7 how we categorize, so the overarching may 8 be a minor aggressive act or fighting, and 9 then we then dive in deeper and we find 10 out oftentimes the cause would be social 11 media. So the social media may not be the 12 overarching category for the coding of the 13 discipline. 14 A lot of the assaults also come from 15 that threat. We've also seen a lot of 16 threats happening through social media and 17 online which then are then disruption. 18 The other part about disruption and 19 defiance, what we're seeing -- it doesn't 20 necessarily explicitly say defiance, but 21 defiance could be meaning in a multitude 22 of ways. 23 One of the main ways we're seeing 24 students that show defiance and disrespect 25 in our classrooms is when teachers ask</p>	<p style="text-align: right;">Page 226</p> <p>1 BY MS. DEGTYAREVA: 2 Q. Are you aware of any category in the 3 code of conduct that is just about cellphone use 4 and not other types of violations that don't 5 include cellphones? 6 MR. CUTLER: Object to form. 7 THE WITNESS: So I am aware of 8 cellphone use being connected in several 9 other categories, yes. 10 BY MS. DEGTYAREVA: 11 Q. Is that a no to my question, that 12 there's no other category that is just about 13 cellphone use and no other types of conduct? 14 MR. CUTLER: Object to form. Asked 15 and answered. 16 THE WITNESS: Correct, there's no 17 other category that says just cellphone 18 use, but it is highlighted throughout. 19 BY MS. DEGTYAREVA: 20 Q. Okay. So let's take a look again at 21 tab -- excuse me, Exhibit 22, which is the 22 spreadsheet showing the different types of 23 violations and the numbers. 24 Now, you talked about this improper 25 use of technology section. And if you look at</p>
<p style="text-align: right;">Page 225</p> <p>1 students to put their cellphones away and 2 it comes into a power struggle. So then 3 the defiance would be that code, but then 4 through that conversation and then 5 identifying, well, what was the triggering 6 point, it's most oftentimes cell phones. 7 So it's very difficult to -- if we 8 were to be able to write out absolutely 9 every behavior that a student would do, 10 then our code of conduct would be 57,000 11 pages long, which is difficult. So we 12 have to make those exceptions, and so, 13 yes, it does kind of a catchall for a lot 14 of the things, but a lot of these would be 15 connected to technology and social media 16 in some way. 17 BY MS. DEGTYAREVA: 18 Q. Ms. Shivanonda, let me ask my 19 question again. 20 Are you aware of any other category 21 in the code of conduct that is specifically just 22 about cellphone use? 23 MR. CUTLER: Object to form. 24 THE WITNESS: Well, I believe I just 25 gave some examples.</p>	<p style="text-align: right;">Page 227</p> <p>1 this spreadsheet, there are a lot of entries for 2 technology, improper use of. Nothing here has 3 that category further broken down to say how 4 many were for possession of a cellphone or use 5 of social media or vandalism of a computer or 6 something else, right? 7 A. Correct. 8 Q. And if you look at just one year -- 9 so scroll up, please -- this is 2023 10 through 2024, and if we scroll back down until 11 we get to the improper use of technology section 12 on rows 109 through 120, so you see it has all 13 the grades and then the number of incidents for 14 each grade, right? 15 A. That is what the spreadsheet shows, 16 yes. 17 Q. I did the math on this earlier, and 18 if you add all of those up, you would get 179 if 19 I did my math correctly. 20 So looking at the spreadsheet, can 21 you tell us how many of those 179 incidents 22 involved cellphones as opposed to, again, 23 vandalism of a computer or something else? 24 MR. CUTLER: Object to form. Asked 25 and answered.</p>

<p style="text-align: right;">Page 228</p> <p>1 THE WITNESS: From this explicit --  2 this spreadsheet and numbers, no. But if  3 you were to dive in deeper, which is kind  4 of the way that schools work, we do dive  5 in deeper and I could tell you that the  6 majority of those would have something to  7 do with a cellphone and social media use.  8 BY MS. DEGTYAREVA:  9 Q. When you say the majority, has TUSD  10 analyzed if that's more than 50 percent, more  11 than 75 percent, or what the percentage is?  12 A. Anecdotal through conversations,  13 yes, we are finding at least 90 to 95 percent of  14 improper use of technology. The reality is that  15 our students are not using their Chromebooks for  16 improper use, they are using their cellphones,  17 so I would say, yes, 90 to 95 percent would have  18 some connection to do with cellphones and social  19 media, as well as the rest of these offenses as  20 well.  21 I would also say at least 70 to  22 75 percent there would be again a through line  23 of social media and cellphone use connected to  24 the other behaviors that we're seeing on our  25 school campuses.</p>	<p style="text-align: right;">Page 230</p> <p>1 cellphone rings to get approval to do  2 discipline, 90 to 95 percent of that has a  3 social media or cellphone connection.  4 BY MS. DEGTYAREVA:  5 Q. When you say that you did this  6 analysis, how did you go about doing it? Did  7 you add up all the numbers and then look at the  8 underlying data and do a calculation to show  9 that it was 90 to 95 percent for all of the  10 years you mentioned?  11 MR. CUTLER: Object to form. Asked  12 and answered.  13 Go ahead.  14 THE WITNESS: Well, we don't -- to  15 be honest, we don't have the time or the  16 capacity or the staff to be able to do  17 that. Our time is in classrooms with  18 students, our time is talking with  19 administrators to see the 15-hour days  20 that they work on a daily basis as they  21 are dealing with and responding to  22 discipline and needs of teachers based on  23 that.  24 So no, we haven't had an explicit  25 data dig, but again through our ongoing</p>
<p style="text-align: right;">Page 229</p> <p>1 Q. When was that analysis done showing  2 that 90 to 95 percent of improper use of  3 technology related to cellphones and 70 to  4 75 percent of the other offenses related to  5 cellphones?  6 MR. CUTLER: Object to form.  7 THE WITNESS: It's been ongoing, so  8 we've been talking about -- you know, at  9 least from 2014, 2015, 2016, we're seeing  10 an increase in behaviors. And as we  11 continue to again analyze the data at  12 school level, at district level, through  13 those conversations, through talking with  14 teachers, through talking with students,  15 through talking with parents, it's just  16 becoming more and more clear that that is  17 the main issue that we're seeing on our  18 campuses.  19 So when talking -- and also in  20 preparation for the deposition, in talking  21 with our director of school safety, our  22 director of discipline, those are  23 continuously the conversations that we are  24 talking about.  25 So every time Ms. Warmbrand, her</p>	<p style="text-align: right;">Page 231</p> <p>1 conversations, this is always a thread of  2 all of the discussions around what are the  3 needs of our district.  4 Unfortunately school districts don't  5 work in black and white with data as much  6 as possible, it's -- we're working with  7 people, and so our time is dealt dealing  8 with the people, and then a lot of times  9 that paperwork comes later.  10 BY MS. DEGTYAREVA:  11 Q. So you're not aware of any analysis  12 of the actual numerical data that you have in  13 the spreadsheet to show what percentages relates  14 to social media or cellphones?  15 MR. CUTLER: Object to form.  16 THE WITNESS: Again, ongoing  17 conversations. Every school has to  18 evaluate these numbers and these data, and  19 then they walk backwards and see what was  20 happening in any of those infractions, and  21 then they identify what are the potential  22 interventions and plans that they will  23 come up with at behavior management team  24 meetings that they do twice a month. And  25 so through that ongoing, every month,</p>

<p style="text-align: right;">Page 232</p> <p>1 every day, every year we are always adding</p> <p>2 to that overarching data.</p> <p>3 BY MS. DEGTYAREVA:</p> <p>4 Q. So has anyone done a sort of</p> <p>5 collective review of all of these ongoing</p> <p>6 conversations to analyze how many -- or how many</p> <p>7 incidents of discipline you talked about and</p> <p>8 what percentage of those specifically related to</p> <p>9 social media or cellphones?</p> <p>10 MR. CUTLER: Object to form.</p> <p>11 THE WITNESS: So the student</p> <p>12 relations department, they receive all of</p> <p>13 the behavior management team templates</p> <p>14 from all of the schools whenever, and so</p> <p>15 they -- that's part of their role, too, is</p> <p>16 to look at and identify trends, so that</p> <p>17 way we can then identify additional</p> <p>18 supports that may be needed at our</p> <p>19 schools.</p> <p>20 BY MS. DEGTYAREVA:</p> <p>21 Q. So have they done an analysis to</p> <p>22 determine specifically what percentage or what</p> <p>23 number of those reports they receive relate to</p> <p>24 cellphone or social media?</p> <p>25 MR. CUTLER: Object to form.</p>	<p style="text-align: right;">Page 234</p> <p>1 teachers and students and administrators,</p> <p>2 administrators will tell you that they spend</p> <p>3 95 percent of their day, and that's their</p> <p>4 opinion, on dealing with behaviors and</p> <p>5 discipline that are related to social media.</p> <p>6 Q. So that percentage, that's your</p> <p>7 impression of the opinions of administrators</p> <p>8 you've spoken to?</p> <p>9 MR. CUTLER: Object to form.</p> <p>10 THE WITNESS: Correct.</p> <p>11 BY MS. DEGTYAREVA:</p> <p>12 Q. And then the other percentage you</p> <p>13 gave us, the 70 to 75 percent of the other</p> <p>14 violations relating to social media or</p> <p>15 cellphones, is that also your impression based</p> <p>16 on the opinions of the administrators you've</p> <p>17 spoken to?</p> <p>18 MR. CUTLER: Object to form.</p> <p>19 THE WITNESS: Based on, yes, the</p> <p>20 anecdotal data that they collect on a</p> <p>21 daily basis for 180 days in a school year,</p> <p>22 ten hours a day working with students and</p> <p>23 families, yes.</p> <p>24 BY MS. DEGTYAREVA:</p> <p>25 Q. Now, you also talked earlier about</p>
<p style="text-align: right;">Page 233</p> <p>1 THE WITNESS: I'm not aware of an</p> <p>2 explicit analysis, but again overarching</p> <p>3 analysis, kind of anecdotally looking at</p> <p>4 what we are seeing on a regular basis,</p> <p>5 that is the soft analysis, I would say.</p> <p>6 BY MS. DEGTYAREVA:</p> <p>7 Q. When you say "overarching analysis,"</p> <p>8 is that recorded anywhere?</p> <p>9 A. Again through conversations, it's</p> <p>10 through looking through the -- so that</p> <p>11 department, they -- we have 88 schools and they</p> <p>12 have that meeting twice a month, so they are</p> <p>13 looking at 175 documents per month. And so the</p> <p>14 reality is there's three people in that</p> <p>15 department, so being able to critically analyze</p> <p>16 and get you a number on a spreadsheet is</p> <p>17 probably not going to be accurate.</p> <p>18 Q. So when you cited that percentage 90</p> <p>19 to 95 percent of improper use of technology</p> <p>20 relates to cellphone or social media, are you</p> <p>21 aware of any actual hard data that backs up your</p> <p>22 percentage?</p> <p>23 A. The way that school districts use</p> <p>24 hard data is again in those conversations and</p> <p>25 those analyses. So when we talk again with</p>	<p style="text-align: right;">Page 235</p> <p>1 Awareity, and that's another reporting platform</p> <p>2 that TUSD uses, right?</p> <p>3 A. Correct.</p> <p>4 Q. So students, families, teachers,</p> <p>5 members of the community, anyone can report</p> <p>6 information to TUSD using Awareity, right?</p> <p>7 A. That is correct.</p> <p>8 Q. And what are the types of things</p> <p>9 that can be reported via Awareity?</p> <p>10 A. Concerns about HR issues; if a</p> <p>11 parent is angry that a principal didn't handle</p> <p>12 something appropriately; facilities concerns;</p> <p>13 groundskeeping concerns. They can report that</p> <p>14 they've seen another student post something</p> <p>15 concerning online. They can report that they</p> <p>16 heard their child talking about -- with other</p> <p>17 students that there's going to be a fight on</p> <p>18 campus. Really just anything that they might</p> <p>19 have a concern that they can report.</p> <p>20 Q. Has TUSD ever done an analysis of</p> <p>21 the hard data from Awareity to determine what</p> <p>22 percentage of those reports relate to social</p> <p>23 media?</p> <p>24 A. I imagine that that data is</p> <p>25 regularly reviewed. I am not always part of</p>

<p style="text-align: right;">Page 236</p> <p>1 that data analysis, that goes through our  2 regional assistant superintendents, and then  3 they will reach out to specific departments,  4 depending upon the supports that are needed.  5 Q. So the regional assistant  6 superintendents are the ones that review the  7 Awareity data?  8 A. Correct.  9 Q. And are you aware of any analysis  10 that they have conducted of the hard data from  11 Awareity to determine what percentage of the  12 reports relate to social media?  13 A. I am not aware.  14 Q. Apart from Synergy and Awareity, are  15 there any other databases that might contain  16 reports relating to harm caused by social media?  17 A. The MTSS platform in Synergy.  18 Q. And MTSS platform, again that's the  19 platform that the MTSS department uses to enter  20 data about students?  21 A. The MTSS department utilizes it, and  22 then teachers and other support staff also enter  23 in their own observational data as well as  24 intervention data.  25 Q. Are you aware of anyone at TUSD that</p>	<p style="text-align: right;">Page 238</p> <p>1 The results of the analysis of the  2 data, where are those results of the analysis  3 stored?  4 MR. CUTLER: Object to form.  5 THE WITNESS: Again in Synergy. So  6 those are reports that can be pulled from  7 Synergy, similarly to discipline level  8 reports.  9 BY MS. DEGTYAREVA:  10 Q. And so if somebody pulls those  11 reports and conducts an analysis, is the  12 analysis also stored in Synergy, or is the  13 analysis from the report stored somewhere else?  14 MR. CUTLER: Object to form.  15 THE WITNESS: So we pull reports  16 constantly to drive decisions around the  17 supports that we're providing for our  18 students and our staff. So I would  19 imagine that a lot of those reports would  20 be used internally within MTSS to drive  21 that and make decisions around the  22 efficacy of the MTSS program.  23 I know that when MTSS -- at every  24 school site it is a requirement that  25 there's an MTSS team that meets on a</p>
<p style="text-align: right;">Page 237</p> <p>1 has done an analysis of the hard data from the  2 MTSS platform to determine what percentage of  3 the reports in there relate to social media?  4 A. Yes. So our MTSS department does  5 regularly analyze the types of categories in  6 observations and in interventions needed to  7 drive their work, yes.  8 Q. Who would do that analysis?  9 A. That would be Michael Blunt.  10 Q. And is that -- are the results of  11 that analysis reported anywhere?  12 A. It's --  13 Q. Please go ahead.  14 A. It is my understanding that that  15 data is used in a multitude of ways, so within  16 the MTSS department there are around 81 what we  17 call MTSS facilitators, and they work directly  18 on school campus. And so to drive overarching  19 needs and interventions, I know my department in  20 SEL, our equity departments, we do regularly  21 take a look at some of that data to again drive  22 our intervention practices, yes.  23 Q. So where is the data stored?  24 A. In Synergy.  25 Q. That was an unclear question.</p>	<p style="text-align: right;">Page 239</p> <p>1 regular basis, which also includes the  2 school counselors, it also includes  3 administrators, teachers, so they are  4 regularly evaluating the data from their  5 school.  6 And then at the district level, yes,  7 we do evaluate that data for a myriad of  8 decision-making.  9 BY MS. DEGTYAREVA:  10 Q. And again, Ms. Shivanonda, just to  11 be clear, I'm not asking how the data is used.  12 I'm just trying to find out where are the  13 results of the analysis conducted, where is that  14 stored?  15 MR. CUTLER: Object to form. Asked  16 and answered.  17 THE WITNESS: So it would be  18 variable. So across the district,  19 different departments would be using data  20 in different ways to drive their  21 decision-making processes.  22 BY MS. DEGTYAREVA:  23 Q. So are you aware of any specific  24 analysis done of the MTSS data that shows what  25 percentage of reports in MTSS relate to social</p>



<p style="text-align: right;">Page 240</p> <p>1 media?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. When was that specific</p> <p>4 analysis done?</p> <p>5 MR. CUTLER: Object to form.</p> <p>6 THE WITNESS: It's ongoing.</p> <p>7 BY MS. DEGTAREVA:</p> <p>8 Q. And have you reviewed the results of</p> <p>9 that analysis that you're talking about?</p> <p>10 MR. CUTLER: Object to form.</p> <p>11 THE WITNESS: Yes. So again,</p> <p>12 different departments will review it in</p> <p>13 different -- in different terms and in</p> <p>14 different ways.</p> <p>15 BY MS. DEGTAREVA:</p> <p>16 Q. Okay. So this analysis you're</p> <p>17 talking about, how many reports were included?</p> <p>18 A. I don't know the number of reports.</p> <p>19 Again, they are pulled in different ways and at</p> <p>20 different times to -- the difficulty is we're</p> <p>21 not a corporation, so we don't necessarily just</p> <p>22 have one report for this one thing. It's very</p> <p>23 muddy, so to speak, in a school district so</p> <p>24 we're pulling different reports, school level</p> <p>25 data, district level data, identifying like what</p>	<p style="text-align: right;">Page 242</p> <p>1 consistently increased, so we began using MTSS</p> <p>2 Synergy in 2020, and we have seen a consistent</p> <p>3 increase in the number of observations teachers</p> <p>4 are making related to cellphones and social</p> <p>5 media usage.</p> <p>6 Q. You mentioned that your department,</p> <p>7 the SEL department, is one of the departments</p> <p>8 that utilizes the analysis of the MTSS data. So</p> <p>9 if we wanted to see your department's analysis</p> <p>10 of that data, where would we go to find that?</p> <p>11 MR. CUTLER: Object to form.</p> <p>12 THE WITNESS: Again the data is in</p> <p>13 Synergy, so we may or may not pull that</p> <p>14 data.</p> <p>15 My department meets regularly with</p> <p>16 the MTSS department as well as the student</p> <p>17 relations department to have ongoing</p> <p>18 collaborations to identify the needs and</p> <p>19 how school counselors are responding to</p> <p>20 those needs. So we may have pulled some</p> <p>21 of that data. It may be stored in an</p> <p>22 e-mail, it may have been shared. I can't</p> <p>23 specifically tell you exactly where that</p> <p>24 data is sitting right now.</p> <p>25 ///</p>
<p style="text-align: right;">Page 241</p> <p>1 is actually happening, and then those reports</p> <p>2 are -- that's the data of the reporting from the</p> <p>3 teacher.</p> <p>4 So if a teacher -- what we call is</p> <p>5 an observation, a teacher will note an</p> <p>6 observation that Johnny had his cellphone out</p> <p>7 today, Johnny refused to give me his cellphone</p> <p>8 today, Johnny ran out of the room because he was</p> <p>9 angry that we tried to take his cellphone,</p> <p>10 Johnny was showing people things on his</p> <p>11 Instagram, those are kind of some of the things</p> <p>12 that we would be seeing noted from teachers in</p> <p>13 that MTSS. So then different departments would</p> <p>14 then use those different analyses in different</p> <p>15 ways.</p> <p>16 So do we have one specific report</p> <p>17 that the entire district uses? I can't answer</p> <p>18 that. But we use different reports to drive</p> <p>19 different decision-making practices.</p> <p>20 Q. So based on the analysis that you're</p> <p>21 aware of, what was the specific percentage of</p> <p>22 the reports that relate to social media on the</p> <p>23 MTSS database?</p> <p>24 A. I do not have that number off the</p> <p>25 top of my head. I do know that it has</p>	<p style="text-align: right;">Page 243</p> <p>1 BY MS. DEGTAREVA:</p> <p>2 Q. Is there any document that -- is</p> <p>3 there any document that reflects analysis</p> <p>4 conducted by your department of the MTSS data?</p> <p>5 MR. CUTLER: Object to form.</p> <p>6 THE WITNESS: I mean, anecdotally,</p> <p>7 through different discussions, through</p> <p>8 different -- as we are looking at some of</p> <p>9 the data that we also look at, hiring</p> <p>10 decisions.</p> <p>11 So, for example, when we identify</p> <p>12 the need for additional school counselors</p> <p>13 and we receive the school safety grant</p> <p>14 from the Arizona Department of Education,</p> <p>15 that was one of our data sources that we</p> <p>16 utilized to determine which of our schools</p> <p>17 that that additional school counselor may</p> <p>18 be placed at.</p> <p>19 And I know the same types of data,</p> <p>20 MTSS also makes those decisions, student</p> <p>21 relations with their restorative practices</p> <p>22 facilitators, that's the type of data that</p> <p>23 would also be used for placement decisions</p> <p>24 based on school need.</p> <p>25 So I can't necessarily tell you</p>

<p style="text-align: right;">Page 244</p> <p>1 where a report is sitting, I just know  2 that the reports live in Synergy, and  3 different stakeholders will utilize those  4 reports from Synergy on a regular basis to  5 make decisions based on the need of the  6 schools.  7 BY MS. DEGTYAREVA:  8 Q. We've talked about a couple of the  9 different databases in Synergy. Can you tell me  10 what are all of the databases that Synergy  11 contains?  12 A. I -- we would be here all day. So  13 Synergy is our student information system, and  14 it's a very comprehensive system.  15 So our health services records would  16 be housed in Synergy, demographic data of  17 students and families are housed in Synergy,  18 discipline, school schedules and individual  19 student schedules are housed in Synergy, the  20 MTSS is housed in Synergy, which includes our  21 request for support process.  22 So within MTSS a teacher or a staff  23 member can request counseling support, they can  24 request support from our student equity  25 departments, they can request support from our</p>	<p style="text-align: right;">Page 246</p> <p>1 bit and to move on to another topic.  2 Are you familiar with something  3 called Jake's Law?  4 A. I am.  5 Q. And Jake's Law is an Arizona state  6 law that was enacted in 2020, is that right?  7 A. Correct.  8 Q. It was enacted in response to a  9 teenager's tragic death by suicide?  10 A. That is correct.  11 Q. And Jake's family fought for this  12 law because their son was denied mental health  13 services by his insurance company when he needed  14 it most, right?  15 A. Correct.  16 Q. Now, Jake's Law ended up requiring  17 insurance companies to cover mental health in  18 the same way that they would physical health,  19 right?  20 A. Correct.  21 Q. And Jake's Law also had an impact on  22 schools, right?  23 A. Correct.  24 Q. So specifically, Jake's Law required  25 Arizona schools starting in 2020 to develop a</p>
<p style="text-align: right;">Page 245</p> <p>1 ex ed departments. There's a lot happening in  2 Synergy.  3 Q. And apart from the -- we've talked  4 about the Synergy discipline data, Awareity, the  5 MTSS Synergy platform. Any other databases that  6 might contain information relating to harms  7 caused by -- or reports of harms caused by  8 social media?  9 MR. CUTLER: Object to form.  10 THE WITNESS: I can't speak to all  11 of what types of data are pulled at our  12 almost 90 school sites. As you showed a  13 document yesterday, Tucson High did their  14 own internal analysis of that data, so I  15 imagine that there may be internal  16 documents and internal analyses that are  17 done, but that would probably be site by  18 site.  19 The main platforms that we would  20 utilize for discipline or decision-making  21 would be the platforms that you just  22 named.  23 BY MS. DEGTYAREVA:  24 Q. Okay. Got it.  25 I'm going to switch gears a little</p>	<p style="text-align: right;">Page 247</p> <p>1 policy to refer students for behavioral health  2 services, right?  3 A. Correct.  4 Q. Did TUSD develop such a policy in  5 response to Jake's law?  6 A. We developed practices and  7 memorandums of understanding with various mental  8 health agencies. To my knowledge, I don't  9 believe that there is an explicit governing  10 board policy around referrals.  11 Q. It established partnerships or  12 memorandums of understanding with mental health  13 providers, right, to make referrals that it was  14 required to make under Jake's Law?  15 A. Correct.  16 Q. Are some of those Casa de los Ninos?  17 A. Yes.  18 Q. La Frontera?  19 A. Yes.  20 Q. Intermountain?  21 A. Yes. And COPE.  22 Q. Excuse me, which one?  23 A. COPE.  24 Q. COPE. Got it.  25 And then Jake's Law also established</p>

14 (Pages 244 - 247)

<p style="text-align: right;">Page 248</p> <p>1 funds for behavioral health services for both 2 uninsured and underinsured students? 3 A. Correct. And that funding is no 4 longer available. 5 Q. Currently is TUSD still able to 6 refer students to mental health providers even 7 if the students are uninsured? 8 A. So, yes. So as I spoke about 9 yesterday, we do still have our practice of 10 referring to behavioral health agencies. Due to 11 the reduction of funding of Jake's Law and the 12 Mental Health Block Grant, it has created 13 barriers for accessing. 14 And so I know that a document was 15 produced, so if we see in that data a decrease 16 in number of referrals over the last year, that 17 is due to the lack of funding. So it becomes a 18 barrier. 19 We still have conversations with 20 families and we still encourage families to seek 21 help, and we offer resources and do try to do 22 that referral. However, then when they go 23 through behavioral health agencies, if that 24 funding is not available, then it does create 25 barriers in access to the mental health</p>	<p style="text-align: right;">Page 250</p> <p>1 (Tucson-30(b)(6)-Shivanonda-23 was 2 marked for identification.) 3 BY MS. DEGTYAREVA: 4 Q. Ms. Shivanonda, this is from the 5 Arizona Department of Education. It's a 6 presentation labeled Suicide Prevention 7 Legislation 2021-2023. 8 And if you turn to page 3 of the 9 document, which is ending in Bates 631, do you 10 see where it says, "Beginning in the 2020-2021 11 school year, school districts and charter 12 schools shall provide training in suicide 13 awareness and prevention for school guidance 14 counselors, teachers, principals and other 15 school personnel who work with pupils in grades 16 six through twelve"? 17 Is that your understanding of what 18 was required of schools? 19 A. Yes. 20 Q. And then if you go to the next page 21 ending in Bates 632, this lists some trainings 22 that have been identified by AHCCCS that would 23 be available for schools to meet these 24 requirements that were established by the law, 25 right?</p>
<p style="text-align: right;">Page 249</p> <p>1 services. 2 Q. Got it. 3 So at least while the funding was 4 available, would you agree that as a result of 5 Jake's Law Arizona had made it easier for 6 students to access mental health services? 7 MR. CUTLER: Object to form. 8 THE WITNESS: I would say Jake's Law 9 created more opportunities for access to 10 services. 11 BY MS. DEGTYAREVA: 12 Q. And then the barrier that you talked 13 about that might prevent some students from 14 getting the mental health treatment they need, 15 that was a result of a lack of funding? 16 A. Correct. 17 Q. Now, Arizona also passed another law 18 in 2020 that related to mental health and 19 schools, right, the Mitch Warnock Act? 20 A. Correct. 21 Q. And the Mitch Warnock Act 22 requires -- 23 MS. DEGTYAREVA: Actually, let's 24 mark as Exhibit 23 tab 37. 25 ///</p>	<p style="text-align: right;">Page 251</p> <p>1 A. That is what it looks like, yes. 2 Q. Now, AHCCCS is the Arizona Health 3 Care Cost Containment System? 4 A. Correct. 5 Q. That's sort of Arizona's Medicaid 6 system, right? 7 A. Correct. 8 Q. And some of the trainings suggested 9 by AHCCCS to meet the legal requirement include 10 Question, Persuade, and Refer, or QPR, right? 11 A. Correct. 12 Q. Is that a program that TUSD uses? 13 A. It is. 14 Q. Another training suggested by AHCCCS 15 to meet the legal requirement includes Youth 16 Mental Health First Aid, right? 17 A. Correct. 18 Q. And is that a program that TUSD 19 uses? 20 A. It is. 21 Q. And then another training that is 22 suggested by AHCCCS to meet the legal 23 requirement include ACT on FACTS, right? 24 A. Correct. 25 Q. Is that a program that TUSD uses?</p>



<p style="text-align: right;">Page 252</p> <p>1 A. It is.</p> <p>2 Q. You can set that aside.</p> <p>3 A. And I will say, so the requirement</p> <p>4 of the State is that all school personnel in</p> <p>5 grades 6 through 12, and TUSD's expectation is</p> <p>6 that all personnel in grades K through 12 are</p> <p>7 expected to comply with that requirement every</p> <p>8 three years.</p> <p>9 Q. Got it. Thank you for that</p> <p>10 clarification.</p> <p>11 Now, you testified several times in</p> <p>12 the deposition about some grant applications</p> <p>13 related to mental health services, right?</p> <p>14 A. Yes.</p> <p>15 Q. So TUSD applies for various grants</p> <p>16 to get funding related to mental health</p> <p>17 services?</p> <p>18 A. Correct.</p> <p>19 MS. DEGTYAREVA: Let's mark as</p> <p>20 Exhibit 24 tab 26.</p> <p>21 (Tucson-30(b)(6)-Shivanonda-24 was</p> <p>22 marked for identification.)</p> <p>23 BY MS. DEGTYAREVA:</p> <p>24 Q. If you look at Exhibit 20- -- excuse</p> <p>25 me, Exhibit 24, you'll see it says Enduring</p>	<p style="text-align: right;">Page 254</p> <p>1 sentence under Abstract, can you please read</p> <p>2 that first sentence?</p> <p>3 A. "Research shows that adverse</p> <p>4 childhood events (ACE) contribute to behavioral</p> <p>5 and academic struggles for students, youth</p> <p>6 violence, suicide attempts, risky behaviors and</p> <p>7 substance abuse."</p> <p>8 Would you like me to keep going?</p> <p>9 Q. No. That's fine.</p> <p>10 And then if you go on to page ending</p> <p>11 in Bates 042, under Needs and Resource</p> <p>12 Assessment, do you see it talks about ACE risk</p> <p>13 factors? And then it says, "Risk factors come</p> <p>14 from individuals, families and the community."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Does TUSD agree that factors from</p> <p>18 individuals, individual students, families, and</p> <p>19 from the community can impact a student's mental</p> <p>20 health?</p> <p>21 A. Yes.</p> <p>22 Q. Does TUSD agree that those factors</p> <p>23 from individual students, families, and the</p> <p>24 community can contribute to behavioral and</p> <p>25 academic struggles for students?</p>
<p style="text-align: right;">Page 253</p> <p>1 Change Plan Mini-grant." "Name of District:</p> <p>2 Tucson Unified School District."</p> <p>3 So is this one of the grant</p> <p>4 applications that has been submitted by TUSD?</p> <p>5 A. I am not familiar with this document</p> <p>6 so I would like to take a moment to look through</p> <p>7 it.</p> <p>8 Q. Please take a look.</p> <p>9 (Witness reviewing document.)</p> <p>10 A. Okay.</p> <p>11 Q. Okay. So is this a grant</p> <p>12 application that was submitted by TUSD?</p> <p>13 A. It appears to be.</p> <p>14 Q. And the names of the applicants on</p> <p>15 the first page, Nikki Stefan, Kathy Stinely,</p> <p>16 Laura Lichtenwalner, are those all TUSD</p> <p>17 employees?</p> <p>18 A. Nikki Stefan and Laura Lichtenwalner</p> <p>19 are no longer TUSD employees, but Kathy Stinely</p> <p>20 is.</p> <p>21 Q. Were they TUSD employees in 2016,</p> <p>22 the date of this application?</p> <p>23 A. Yes.</p> <p>24 Q. Now, if you look at the first page</p> <p>25 which is ending in Bates 040, the very first</p>	<p style="text-align: right;">Page 255</p> <p>1 A. Yes, we do, and that community also</p> <p>2 includes social media companies.</p> <p>3 Q. And factors from the individual</p> <p>4 student, from families, and from the community</p> <p>5 can contribute to violence, right?</p> <p>6 A. That is correct.</p> <p>7 Q. And to suicide attempts?</p> <p>8 A. That is correct.</p> <p>9 Q. Now, on that same page ending in</p> <p>10 042, it goes on to list some of the factors, The</p> <p>11 severe potential risk factors in the Tucson</p> <p>12 community, surrounding county and within the</p> <p>13 school district, which suggests that assessing</p> <p>14 students for trauma is indicated in TUSD.</p> <p>15 Do you see that?</p> <p>16 A. I see that.</p> <p>17 Q. Okay. So the first factor it lists,</p> <p>18 "Recent data from the City Data website lists</p> <p>19 the current rate of poverty among children at</p> <p>20 32 percent in Tucson and the TUSD district has</p> <p>21 approximately 73 percent of students receiving</p> <p>22 free and reduced lunch. While poverty is not a</p> <p>23 direct risk factor, it does limit opportunities</p> <p>24 and resources for children and families."</p> <p>25 Did I read that correctly?</p>

<p style="text-align: right;">Page 256</p> <p>1 A. Yes, you did.</p> <p>2 Q. Does TUSD agree that poverty, while</p> <p>3 not a direct risk factor, can impact students'</p> <p>4 mental health by limiting opportunities and</p> <p>5 resources for children and families?</p> <p>6 A. Yes.</p> <p>7 Q. And having limited opportunities and</p> <p>8 resources can also impact academic performance,</p> <p>9 right?</p> <p>10 A. Yes.</p> <p>11 Q. Does TUSD agree that crime in the</p> <p>12 community, and especially violent crime, is</p> <p>13 another risk factor that can impact TUSD</p> <p>14 students' mental health?</p> <p>15 A. Yes. Crime rates mirror the -- a</p> <p>16 lot of the discipline that we're seeing in our</p> <p>17 schools as well.</p> <p>18 Q. So being a victim of a violent crime</p> <p>19 or knowing someone who was a victim, that can</p> <p>20 impact mental health?</p> <p>21 A. Yes.</p> <p>22 Q. It can cause behavioral issues in</p> <p>23 school?</p> <p>24 A. Yes.</p> <p>25 Q. It can impact academic performance?</p>	<p style="text-align: right;">Page 258</p> <p>1 to substance abuse in the home."</p> <p>2 Do you see that?</p> <p>3 A. I see that.</p> <p>4 Q. Do you have any reason to doubt that</p> <p>5 statistic?</p> <p>6 A. Again, without the research in front</p> <p>7 of me, no, I will take this at face value.</p> <p>8 Q. Does TUSD agree that homelessness is</p> <p>9 a risk factor that can impact student mental</p> <p>10 health?</p> <p>11 A. Yes.</p> <p>12 Q. It can cause behavioral issues in</p> <p>13 school?</p> <p>14 A. Yes.</p> <p>15 Q. It can impact academic performance?</p> <p>16 A. Yes.</p> <p>17 Q. So going on to the next page ending</p> <p>18 in Bates 043, at the very top do you see where</p> <p>19 it says that, "Reports show that youth</p> <p>20 homelessness rates in Arizona are the highest in</p> <p>21 the nation and six thousand homeless youth</p> <p>22 reside in Pima County. (Tucson is in Pima</p> <p>23 County)."</p> <p>24 Do you see that?</p> <p>25 A. I do.</p>
<p style="text-align: right;">Page 257</p> <p>1 A. Yes.</p> <p>2 Q. And the application here states,</p> <p>3 "Tucson has a crime rate that is nearly double</p> <p>4 the average national rate, including violent</p> <p>5 crimes."</p> <p>6 Do you see that?</p> <p>7 A. I do see that.</p> <p>8 Q. Do you have any reason to disagree</p> <p>9 with that statistic?</p> <p>10 A. Outside of not having that</p> <p>11 information from 2016 readily available, no, I</p> <p>12 will take that at face value.</p> <p>13 Q. Does TUSD agree that family trauma</p> <p>14 and substance abuse in the home are also risk</p> <p>15 factors that can impact student mental health?</p> <p>16 A. Yes.</p> <p>17 Q. And those risk factors can also</p> <p>18 cause behavioral issues in school?</p> <p>19 A. Yes.</p> <p>20 Q. They can impact academic</p> <p>21 performance?</p> <p>22 A. Yes.</p> <p>23 Q. Now, the application states, "There</p> <p>24 are currently more than 18,000 children in child</p> <p>25 welfare custody with many of these cases related</p>	<p style="text-align: right;">Page 259</p> <p>1 Q. Do you have any reason to doubt that</p> <p>2 statistic?</p> <p>3 A. I do not.</p> <p>4 Q. Now, this Needs and Resource</p> <p>5 Assessment section that we've been looking at,</p> <p>6 that doesn't mention the word "social media,"</p> <p>7 right? And you can read through it if you would</p> <p>8 like.</p> <p>9 A. It does not directly mention social</p> <p>10 media, no, in that section.</p> <p>11 MS. DEGTAREVA: Let's mark as</p> <p>12 Exhibit 25 tab 58.</p> <p>13 (Tucson-30(b)(6)-Shivanonda-25 was</p> <p>14 marked for identification.)</p> <p>15 BY MS. DEGTAREVA:</p> <p>16 Q. Now, this is an e-mail chain that</p> <p>17 you are on, and it has the subject line US</p> <p>18 Department of Ed Mental Health Grants, right?</p> <p>19 A. It does.</p> <p>20 Q. The U.S. Department of Ed mental</p> <p>21 health grants, are those also grants that TUSD</p> <p>22 applies for?</p> <p>23 A. It was a grant that we were</p> <p>24 attempting to apply for.</p> <p>25 Q. So if you look at the next page,</p>

<p style="text-align: right;">Page 260</p> <p>1 which is ending in Bates 903, at the very bottom  2 there's an e-mail from you, and it says, "The  3 SEL Department is planning to partner with UofA  4 counseling department to write for both the  5 School-Based Mental Health Services Grant and  6 the Mental Health Service Professional  7 Demonstration Grant."  8 Are those the two grants that you  9 were planning to apply for?  10 A. Yes.  11 Q. And both of those relate to mental  12 health services?  13 A. Yes.  14 Q. Now, in the initial e-mail on the  15 page ending in Bates 904, this is an e-mail from  16 Lia Falco?  17 A. Correct.  18 Q. Who is that?  19 A. She is a professor of research at  20 the University of Arizona College of Education.  21 Q. And in this e-mail she's listing  22 some of the factors that you could list in the  23 grant application that might impact mental  24 health in schools, right?  25 A. Let me do a quick review.</p>	<p style="text-align: right;">Page 262</p> <p>1 mental health support in schools?  2 MR. CUTLER: Object to form.  3 THE WITNESS: Yes, those are factors  4 that would create a need.  5 BY MS. DEGTYAREVA:  6 Q. Now, going to the first page of this  7 exhibit which is ending in 902, there's an  8 e-mail from you on October 11, 2022.  9 Do you see that?  10 A. I do.  11 Q. And in this e-mail you write with  12 some additional ideas on "data points showing  13 that TUSD is of significant need for more mental  14 health practitioners in schools."  15 Right?  16 A. Yes, that is what that says.  17 Q. Okay. So some of the -- can you  18 read the next sentence of some of the things  19 that you listed?  20 A. "Teaching, counselling, and social  21 worker vacancies would be a great point, status  22 of title 1 and free and reduced lunch  23 eligibility, behavior data, attrition rate of  24 staff, student attrition rate, etc. come to the  25 front of my mind first."</p>
<p style="text-align: right;">Page 261</p> <p>1 (Witness reviewing document.)  2 A. Okay. Yes.  3 Q. So --  4 A. Can you repeat your question now  5 that I've read it?  6 Q. Yeah. So looking -- in this e-mail  7 she is describing some of the factors that might  8 affect student mental health in schools that you  9 could list in the application, right?  10 A. Yes. So this is per the application  11 what are some of the data points that we would  12 need to provide, yes.  13 Q. So looking at the last sentence of  14 her e-mail, some of the things she lists here  15 include chronic absenteeism, right?  16 A. Correct.  17 Q. School violence/crime data?  18 A. Yes.  19 Q. Data related to suicide rates?  20 A. Yes.  21 Q. Descriptions of barriers to hiring  22 and retaining service providers?  23 A. Yes.  24 Q. Do you agree that those are all  25 factors that might indicate a greater need for</p>	<p style="text-align: right;">Page 263</p> <p>1 Q. So at this time did TUSD have  2 teaching, counseling, and social worker  3 vacancies?  4 A. Yes. We almost always have  5 vacancies.  6 Q. Did it have a high percentage of  7 Title I and free and reduced lunch eligibility?  8 A. Yes.  9 Q. You also mentioned staff attrition  10 rates. Were a lot of TUSD staff leaving the  11 district?  12 A. I don't recall at that point. I do  13 know that through different topics of  14 conversations of staff attrition rate were  15 topics of conversation, so I would imagine we at  16 least had some, yes.  17 Q. And then you mentioned student  18 attrition rates. So were there TUSD students  19 who were leaving the district?  20 A. Yes. The district has been  21 monitoring student enrollment for several years.  22 Q. And you agree that these are all  23 factors that show that TUSD is of significant  24 need for more mental health practitioners in  25 schools?</p>

18 (Pages 260 - 263)

<p style="text-align: right;">Page 264</p> <p>1 A. Correct.</p> <p>2 Q. Now, in this e-mail you didn't use</p> <p>3 the word "social media," right?</p> <p>4 A. I did not.</p> <p>5 MS. DEGTYAREVA: Okay. Let's mark</p> <p>6 as Exhibit 26 tab 59.</p> <p>7 (Tucson-30(b)(6)-Shivanonda-26 was</p> <p>8 marked for identification.)</p> <p>9 BY MS. DEGTYAREVA:</p> <p>10 Q. Taking a look at tab -- Exhibit 26,</p> <p>11 at the top it says School-Based Mental Health</p> <p>12 Services Grant Program Tucson Unified School</p> <p>13 District.</p> <p>14 Does this refer to the same grant</p> <p>15 application as in the e-mail we were just</p> <p>16 looking at?</p> <p>17 A. Without further context I cannot be</p> <p>18 100 percent sure.</p> <p>19 Q. Okay. Is this a grant that TUSD was</p> <p>20 applying for, whether or not it's the same one</p> <p>21 that's in the e-mail?</p> <p>22 A. This looks like data that is being</p> <p>23 collected for a potential grant application,</p> <p>24 yes.</p> <p>25 Q. Now, if you look at the metadata</p>	<p style="text-align: right;">Page 266</p> <p>1 Health in the state of Arizona - in 2018 Arizona</p> <p>2 is the second worst state in the nation for</p> <p>3 addressing mental health issues. He said</p> <p>4 Arizona lacks primary-care physicians who can</p> <p>5 screen for mental health and refer patients to</p> <p>6 specialists before the disease has progressed</p> <p>7 much too far."</p> <p>8 Did I read that correctly?</p> <p>9 A. You did read that correctly.</p> <p>10 Q. Do you agree that a lack of primary</p> <p>11 care physicians in Arizona could contribute to</p> <p>12 student mental health issues?</p> <p>13 A. Yes.</p> <p>14 Q. Now, nowhere in this document do you</p> <p>15 use the word "social media," right?</p> <p>16 A. Correct. I do not explicitly call</p> <p>17 out social media. However, social media is</p> <p>18 always a component that is also a factor within</p> <p>19 this.</p> <p>20 We don't -- unfortunately we're</p> <p>21 unable to -- again, like we shared yesterday,</p> <p>22 the data -- we are not able to track the amount</p> <p>23 of time students are on social media, but what</p> <p>24 we are able to track is the behavioral data that</p> <p>25 we do see in our schools that are often</p>
<p style="text-align: right;">Page 265</p> <p>1 slipsheet at the end, you'll see it says Author,</p> <p>2 Julie Shivanonda.</p> <p>3 Did you write this document?</p> <p>4 A. I apparently did. I don't remember</p> <p>5 every document I've written in the last five</p> <p>6 years.</p> <p>7 Q. Now, in this document you're again</p> <p>8 summarizing some of the factors that you could</p> <p>9 list in support of your grant application for</p> <p>10 additional mental health funding, right?</p> <p>11 A. This is what it looks like, yes.</p> <p>12 Q. And looking at the first page, which</p> <p>13 is ending in Bates 360, you write, "Tucson and</p> <p>14 Pima County has a crime rate higher than the</p> <p>15 national average."</p> <p>16 Do you see that?</p> <p>17 A. I do.</p> <p>18 Q. You agree that higher-than-average</p> <p>19 crime rate could negatively affect the mental</p> <p>20 health of TUSD students?</p> <p>21 MR. CUTLER: Object to form. Asked</p> <p>22 and answered.</p> <p>23 THE WITNESS: Correct.</p> <p>24 BY MS. DEGTYAREVA:</p> <p>25 Q. Now, further down you write, "Mental</p>	<p style="text-align: right;">Page 267</p> <p>1 connected and linked to social media use, again</p> <p>2 through conversations and anecdotal data from</p> <p>3 parents, from students, and from teachers.</p> <p>4 Q. So that's a yes to my question, you</p> <p>5 do not mention the word "social media" in this</p> <p>6 document?</p> <p>7 MR. CUTLER: Object to form. Asked</p> <p>8 and answered.</p> <p>9 THE WITNESS: Correct.</p> <p>10 BY MS. DEGTYAREVA:</p> <p>11 Q. Now, there are other risk factors</p> <p>12 that can impact student mental health that we</p> <p>13 haven't covered in these documents yet, right?</p> <p>14 A. Correct.</p> <p>15 Q. Does TUSD agree that students</p> <p>16 abusing alcohol, drugs, or tobacco could impact</p> <p>17 mental health?</p> <p>18 A. Yes.</p> <p>19 Q. It can cause behavioral issues in</p> <p>20 school?</p> <p>21 A. It can.</p> <p>22 Q. It can impact academic performance?</p> <p>23 A. It absolutely can. And the majority</p> <p>24 of what we're finding in the research is that</p> <p>25 students are self-medicating using substances</p>

19 (Pages 264 - 267)

<p style="text-align: right;">Page 268</p> <p>1 because of anxiety and depression, and we're  2 seeing a high increase in anxiety and depression  3 due to social media and cellphone usage and the  4 lack of social experiences that students are not  5 now engaging in because of their social media  6 usage.  7 Q. What research is that?  8 A. The surgeon -- there have been  9 several Surgeon General warnings around youth  10 mental health crisis. I have done a lot of  11 research of the work of Dr. Bruce Perry around  12 the neurosequential model of how students -- or  13 how youth and adolescent brains are developed  14 and the connection to.  15 He also wrote a book called The  16 Anxious Generation that directly pinpoints the  17 use of social media and the lack of connections  18 that students have in person are directly  19 impacting the increase in anxiety and depression  20 that we are seeing in our students and our  21 youth, and we see that in our schools as well.  22 Q. So you're talking about some  23 external --  24 A. I am.  25 Q. -- work.</p>	<p style="text-align: right;">Page 270</p> <p>1 Q. TUSD also believes that use of  2 vaping products caused harm to the school  3 district by requiring it to spend resources to  4 address the problems caused by vaping?  5 A. Correct.  6 Q. TUSD believes that use of vaping  7 products requires teachers and other staff to  8 divert resources from classroom instruction and  9 student supervision, right?  10 A. Correct.  11 Q. TUSD believes that use of vaping  12 products require students and other staff to  13 provide education and assistance to students  14 including an elaborative intervention and  15 restorative process?  16 A. Correct.  17 Q. And TUSD believes that the harms  18 from vaping started in at least 2017, right?  19 A. Without the document in front of me  20 from that case, that does sound familiar.  21 Q. And continued for several years?  22 A. Correct.  23 Q. Does TUSD agree that students  24 bringing weapons to school could impact  25 students' mental health?</p>
<p style="text-align: right;">Page 269</p> <p>1 Has TUSD ever analyzed how many of  2 its students specifically use alcohol, drugs, or  3 tobacco?  4 A. So, again, data can be subjective  5 and difficult to ascertain. If students have  6 either self-reported or families have reported,  7 we might have that data. And then any  8 discipline data related to substance use and  9 alcohol, we would then have that data. But that  10 would not be the full scope of what may be  11 occurring.  12 Q. But the TUSD doesn't know the  13 entirety of how many students are using these  14 substances or how many of these substances  15 they're using?  16 A. Correct.  17 Q. And TUSD actually filed a lawsuit  18 against vaping manufacturers, arguing that  19 vaping products were causing their students to  20 suffer mental health harms, right?  21 A. Correct.  22 Q. TUSD believes that use of vaping  23 products by students have caused disruptions in  24 classrooms and common areas?  25 A. Correct.</p>	<p style="text-align: right;">Page 271</p> <p>1 A. Yes.  2 Q. It could be disruptive to the  3 learning environment?  4 A. Yes.  5 Q. And threats of gun violence, even if  6 there's no actual gun brought, that could also  7 impact students' mental health, right?  8 A. Correct.  9 Q. That could also be disruptive to the  10 learning environment?  11 A. Absolutely.  12 Q. Does TUSD have data on how many  13 times a student has brought a gun to any of its  14 schools?  15 A. Reported. If it was reported, then  16 we would have that data, yes.  17 Q. What did that data show?  18 A. That data shows that the -- I don't  19 know the direct data of the number of the times  20 that weapons were, but I do -- can tell you that  21 that has been increasing over the last several  22 years.  23 One of the difficulties also is that  24 the barriers now because threats of violence,  25 because potential threats of weapons, because it</p>

<p style="text-align: right;">Page 272</p> <p>1 has become so commonplace, we have actually seen  2 a reduction in reports to our school safety. So  3 conversations with administrators, well, if I  4 called school safety every day that I heard a  5 student may have a gun or a knife on them, I  6 would be calling school safety 24/7.  7 And so because it is so pervasive in  8 our schools, that has then started to skew the  9 data that is being reported because we are  10 seeing evidence of it posting on social media,  11 on people talking about it, and so it's become a  12 very difficult data to collect.  13 Q. Does TUSD keep track of how many  14 lockdowns its schools have had?  15 A. Yes, if those are reported. So not  16 every lockdown is necessarily a reportable  17 lockdown.  18 Also, the data, in my preparation  19 for today, I have mentioned before the Tucson  20 school district was engaged in -- or had a cyber  21 breach a couple of years ago. And prior to  22 that, a lot of that data was housed internally  23 and not cloud based, and so that data was not  24 recovered. So we may not have the data going  25 all the way back to the relevant time period,</p>	<p style="text-align: right;">Page 274</p> <p>1 an immediate threat either outside of the campus  2 or within the campus, and so that would be  3 determined with the support of a school safety  4 and/or law enforcement.  5 So for example, there may be a  6 secure-in-place and having students in the  7 classrooms and not moving around on the campus.  8 If there was -- if Tucson Police Department had  9 reached out to the district to say that there  10 was maybe a suspect in the neighborhood, we've  11 had that happen before, and they've asked  12 schools to not let anyone in or out for safety  13 in the community.  14 There has been -- if there's a  15 report of a threat, there could be a secure  16 lockdown based on that.  17 We've had a swarm of bees on the  18 playground where we've kept students in, just so  19 that way they're not going out on the  20 playground.  21 So there's a myriad of reasons.  22 Q. So I understand you don't know exact  23 numbers sitting here today. Can you tell me how  24 frequently TUSD schools have lockdowns?  25 A. It depends on kind of the time</p>
<p style="text-align: right;">Page 273</p> <p>1 but there would be a multitude of reasons why,  2 and again not every lockdown would be reported  3 or tracked.  4 Q. So for lockdowns that are reported,  5 where does TUSD keep track of that data?  6 A. That would be with our school safety  7 department.  8 Q. Is there a particular database that  9 they have?  10 A. They have their own school safety  11 database. I cannot recall the name of it.  12 Q. And how many lockdowns are you aware  13 of in the relevant time period?  14 A. I do not have that number off the  15 top of my head. I can tell you that there's a  16 multitude of reasons of why there may be a  17 lockdown.  18 And then we have different types of  19 lockdowns as well. So it may be a secure  20 lockdown, it may be what's considered kind of a  21 more soft lockdown; it just depends on what type  22 of lockdown you're also referring to.  23 Q. What are the different types of  24 lockdowns?  25 A. So a secure lockdown is if there's</p>	<p style="text-align: right;">Page 275</p> <p>1 frame. It also depends on the grade level of  2 the school. I would say we probably see less  3 secure lockdowns needed at our elementaries  4 versus our middle and our high schools. Off the  5 top of my head, there's probably a handful of  6 lockdowns that are potentially in place across  7 the district probably about every month.  8 Q. A handful every month across all of  9 the schools?  10 A. Correct.  11 MS. DEGTYAREVA: We've been going  12 about an hour and a half. Would now be a  13 good time for a break?  14 THE VIDEOGRAPHER: We're going off  15 record. The time is 10:24.  16 (Whereupon, a recess was taken.)  17 THE VIDEOGRAPHER: We're going back  18 on record. The time is 10:41.  19 BY MS. DEGTYAREVA:  20 Q. Ms. Shivanonda, does TUSD agree that  21 being the victim of bullying, whether it's  22 cyberbullying or in-person bullying, that can  23 impact student mental health?  24 A. Yes, absolutely. Any time students  25 are ostracized or bullied or negative impacts</p>



<p style="text-align: right;">Page 276</p> <p>1 from their peers can have a very high impact on 2 social and mental health. 3 Q. Bullying can be disruptive to the 4 learning environment? 5 A. Absolutely. 6 Q. It can impact academic performance? 7 A. Yes. 8 Q. Does TUSD have any data showing how 9 many of its students have been the victims of 10 any type of bullying? 11 A. The district, we do have a governing 12 board policy against bullying and practice and 13 procedures for supporting that. And then 14 bullying is also one of our components within 15 the code of conduct. So if there's reportable 16 instances of bullying and it rises to the level 17 of discipline, that would be in the discipline 18 data. 19 We also -- again the difficulty of 20 identifying what bullying is versus just kids 21 being mean or conflict, so that can play a role 22 in it. But we might also see observation data 23 from teachers around student behaviors and 24 interactions within the observation data in 25 Synergy, and then also anecdotally just through</p>	<p style="text-align: right;">Page 278</p> <p>1 A. I see this e-mail from Sarah, yes. 2 Q. Who is Sarah Andricopoulos? 3 A. She is the principal of Davidson 4 Elementary School. 5 Q. And she's e-mailing Richard Sanchez, 6 right? 7 A. Correct. 8 Q. Who is Richard Sanchez? 9 A. He is the regional superintendent 10 over Region 3, which is where Davidson is 11 located. 12 Q. So looking at the first paragraph of 13 this e-mail, Sarah Andricopoulos references a 14 parent who made a Facebook post about shooting 15 up a school for Halloween, right? 16 A. That seems to be the context, yes. 17 Q. According to this e-mail, Facebook 18 took down the -- has since taken down the 19 account of that parent, right? 20 A. That's what the e-mail says. 21 Q. Is TUSD aware that if it sees any 22 posts that it believes are harmful or 23 inappropriate on social media, it can report 24 that post? 25 MR. CUTLER: Object to form.</p>
<p style="text-align: right;">Page 277</p> <p>1 conversations of look where we're at and what 2 counselors are seeing and what support staff are 3 seeing, we can kind of get a pulse on higher 4 level of amount. But hard numbers, I don't have 5 that off the top of my head. 6 Q. You mentioned observation data in 7 Synergy. What is that referring to? 8 A. That's part of the MTSS platform. 9 Q. Got it. 10 So if a student didn't report that 11 they were being bullied, TUSD wouldn't have 12 information about that bullying? 13 A. Most likely, yes. 14 MS. DEGTAREVA: Let's mark as 15 Exhibit 27 tab 38. 16 (Tucson-30(b)(6)-Shivanonda-27 was 17 marked for identification.) 18 BY MS. DEGTAREVA: 19 Q. Let me know when you've had a chance 20 to review this. 21 A. Okay. Thank you. 22 (Witness reviewing document.) 23 A. Okay. 24 Q. Do you see this is an e-mail from 25 Sarah Andricopoulos?</p>	<p style="text-align: right;">Page 279</p> <p>1 THE WITNESS: It is my understanding 2 that posts, yes, are able to be reported. 3 There has been other instances where 4 threatening posts have been reported and 5 we have worked with law enforcement and 6 with, in this case, Facebook where at 7 first glance or at first report, Facebook 8 would not take down the post. 9 So we're aware that that could be 10 reported, but we have also had instances 11 where Facebook has not taken down posts as 12 well. 13 BY MS. DEGTAREVA: 14 Q. In this case, though, Facebook took 15 down the entire account, according to this 16 e-mail? 17 A. According to this e-mail. 18 Q. Do you think these types of threats 19 of violence could harm student mental health? 20 A. Absolutely. 21 MR. CUTLER: Object to form. 22 BY MS. DEGTAREVA: 23 Q. And later in that same paragraph, 24 the parent reported that flyers were put up all 25 around school calling her daughter fat, ugly,</p>

22 (Pages 276 - 279)

<p style="text-align: right;">Page 280</p> <p>1 and that she should kill herself, right?</p> <p>2 A. According to the e-mail, yes.</p> <p>3 Q. Do you think that type of bullying</p> <p>4 could harm a student's mental health?</p> <p>5 A. Absolutely.</p> <p>6 Q. And then looking at the third</p> <p>7 paragraph, it references that the FBI had to be</p> <p>8 involved, right?</p> <p>9 A. Yes, this e-mail does reference the</p> <p>10 FBI being involved.</p> <p>11 Q. It says that when the FBI agent</p> <p>12 asked the parent what steps she had taken to</p> <p>13 resolve these allegations of bullying, the</p> <p>14 parent told her that she had tried dealing with</p> <p>15 the principal, police, and TUSD, and no one</p> <p>16 would help her, right?</p> <p>17 MR. CUTLER: Object to form.</p> <p>18 THE WITNESS: That is what is</p> <p>19 indicated in the e-mail.</p> <p>20 BY MS. DEGTAREVA:</p> <p>21 Q. Then if you turn to the page ending</p> <p>22 in Bates 430, you see some screenshots of text</p> <p>23 messages that this parent sent, right?</p> <p>24 MR. CUTLER: Object to form.</p> <p>25 THE WITNESS: Without context and</p>	<p style="text-align: right;">Page 282</p> <p>1 A. Yes, there appears to be.</p> <p>2 Q. And then the parent threatens to</p> <p>3 bring a weapon to the school?</p> <p>4 A. Yes, it does.</p> <p>5 Q. Does TUSD agree that racial</p> <p>6 discrimination can impact students' mental</p> <p>7 health?</p> <p>8 A. Yes. And we have strict governing</p> <p>9 board policies around racial and other types of</p> <p>10 discrimination and harassment policies, yes.</p> <p>11 Q. And racial discrimination, including</p> <p>12 the use of racial slurs, can be disruptive to</p> <p>13 the learning environment?</p> <p>14 A. Yes, it can.</p> <p>15 Q. It can impact academic performance?</p> <p>16 A. Yes, absolutely.</p> <p>17 Q. Now, the repeated racial slurs we</p> <p>18 just saw in these text messages, those aren't an</p> <p>19 isolated incident at TUSD, right?</p> <p>20 MR. CUTLER: Object to form.</p> <p>21 THE WITNESS: There are -- yes,</p> <p>22 there are several instances of racial</p> <p>23 slurs that are used in a multitude of</p> <p>24 contexts across the district.</p> <p>25 MS. DEGTAREVA: Let's mark as</p>
<p style="text-align: right;">Page 281</p> <p>1 with the identifying information removed,</p> <p>2 it does look like text messages, but I</p> <p>3 cannot confirm who sent or who they were</p> <p>4 to.</p> <p>5 BY MS. DEGTAREVA:</p> <p>6 Q. And just looking back at the first</p> <p>7 page of 428, in the one, two, three, fourth</p> <p>8 paragraph it says, "As you are aware this is not</p> <p>9 the first time" redacted "has made threats</p> <p>10 against our school. I've included pictures of</p> <p>11 texts" redacted "sent last March 28, 2018,</p> <p>12 threatening to bring a weapon to our campus,"</p> <p>13 right?</p> <p>14 A. Yes.</p> <p>15 Q. So in these text messages on the</p> <p>16 page ending in 430, those text messages use</p> <p>17 racial slurs numerous times to talk about</p> <p>18 students, right?</p> <p>19 A. Yes, it appears that they do.</p> <p>20 Q. And then turning to the page ending</p> <p>21 in 432, you see some more text messages, right?</p> <p>22 A. I do.</p> <p>23 Q. And again in these text messages,</p> <p>24 again there are multiple instances of racial</p> <p>25 slurs being used?</p>	<p style="text-align: right;">Page 283</p> <p>1 Exhibit 28 tab 31.</p> <p>2 (Tucson-30(b)(6)-Shivanonda-28 was</p> <p>3 marked for identification.)</p> <p>4 A. I will say from our experience, when</p> <p>5 we get law enforcement involved it's easier to</p> <p>6 get things taken down. If we ask, they don't</p> <p>7 get taken down.</p> <p>8 BY MS. DEGTAREVA:</p> <p>9 Q. Just to be clear, the text messages</p> <p>10 we were just looking at were text messages,</p> <p>11 correct?</p> <p>12 A. Yes, they appear to be.</p> <p>13 Q. Now, take a look at the exhibit we</p> <p>14 just marked, 28, and let me know when you're</p> <p>15 ready.</p> <p>16 A. Okay.</p> <p>17 (Witness reviewing document.)</p> <p>18 A. Okay.</p> <p>19 Q. This is a presentation from TUSD's</p> <p>20 Equity, Diversity, and Inclusiveness department?</p> <p>21 A. It appears to be, yes.</p> <p>22 Q. And the presentation wanted to</p> <p>23 launch a No Slur Initiative for the school year</p> <p>24 of 2023-2024, right?</p> <p>25 A. Correct.</p>

23 (Pages 280 - 283)



<p style="text-align: right;">Page 284</p> <p>1 Q. So taking a look at Slide 3, on the</p> <p>2 left-hand side, can you please read what's</p> <p>3 written in that box on the left?</p> <p>4 A. "Post pandemic students and staff in</p> <p>5 the TUSD community have consistently reported</p> <p>6 experiencing and/or witnessing verbal trauma</p> <p>7 including racial epithets and microaggressions."</p> <p>8 Q. Do you have any reason to doubt the</p> <p>9 findings of the EDI department that there was a</p> <p>10 consistent pattern of verbal trauma?</p> <p>11 MR. CUTLER: Object to form.</p> <p>12 THE WITNESS: I do not.</p> <p>13 BY MS. DEGTYAREVA:</p> <p>14 Q. And a consistent pattern of racial</p> <p>15 epithets?</p> <p>16 A. I do not.</p> <p>17 MR. CUTLER: Object to form.</p> <p>18 BY MS. DEGTYAREVA:</p> <p>19 Q. And microaggressions?</p> <p>20 A. I do not.</p> <p>21 MS. DEGTYAREVA: Let's mark as</p> <p>22 Exhibit 29 tab 41.</p> <p>23 (Tucson-30(b)(6)-Shivanonda-29 was</p> <p>24 marked for identification.)</p> <p>25 ///</p>	<p style="text-align: right;">Page 286</p> <p>1 BY MS. DEGTYAREVA:</p> <p>2 Q. Take a look at this document,</p> <p>3 please.</p> <p>4 (Witness reviewing document.)</p> <p>5 A. Okay.</p> <p>6 Q. This is a report from the Department</p> <p>7 of Equity, Diversity, and Inclusiveness at TUSD,</p> <p>8 right?</p> <p>9 A. Correct.</p> <p>10 Q. And if you look under Introduction,</p> <p>11 the second and third paragraphs under</p> <p>12 Introduction, so the report explains that it's</p> <p>13 about some complaints regarding Turning Point</p> <p>14 USA student club at Sabino High School?</p> <p>15 A. Yes, that is what it is talking</p> <p>16 about.</p> <p>17 Q. And then in response to the</p> <p>18 complaints, if you turn to page ending in 808,</p> <p>19 the EDI department held some student forums and</p> <p>20 met with Sabino administration, right?</p> <p>21 A. Yes, that is what it says.</p> <p>22 Q. Looking at the findings, can you</p> <p>23 please read the first bullet point there?</p> <p>24 A. "Students and teachers have</p> <p>25 experienced a culture and climate where racist</p>
<p style="text-align: right;">Page 285</p> <p>1 BY MS. DEGTYAREVA:</p> <p>2 Q. Okay. Just one page. Here you go</p> <p>3 (handing).</p> <p>4 Okay. So taking a look at the</p> <p>5 document in front of you, this is a parent</p> <p>6 complaint from the 2019-2020 school year?</p> <p>7 A. It appears to be.</p> <p>8 Q. And it's from -- the date is</p> <p>9 August 23, 2019?</p> <p>10 A. Yes.</p> <p>11 Q. And if you look at the complaint</p> <p>12 narrative, the parent is complaining about a</p> <p>13 teacher using the N word in class, correct?</p> <p>14 A. Yes.</p> <p>15 Q. You would agree that the use of a</p> <p>16 racial slur by a teacher in a class could harm</p> <p>17 student mental health?</p> <p>18 A. Yes.</p> <p>19 Q. It can be disruptive to the learning</p> <p>20 environment?</p> <p>21 A. It could.</p> <p>22 MS. DEGTYAREVA: Let's mark as</p> <p>23 Exhibit 30 tab 39.</p> <p>24 (Tucson-30(b)(6)-Shivanonda-30 was</p> <p>25 marked for identification.)</p>	<p style="text-align: right;">Page 287</p> <p>1 remarks, jokes, and gestures are the 'norm'</p> <p>2 among students. Derogatory remarks, jokes, and</p> <p>3 gestures are directed toward race, gender, and</p> <p>4 sexuality."</p> <p>5 Q. And then can you please read the</p> <p>6 fourth bullet point?</p> <p>7 A. "Generalized instances of</p> <p>8 discriminative behavior by student members of</p> <p>9 TPUSA on Sabino campus."</p> <p>10 Q. Do you agree that experiencing a</p> <p>11 culture where racist remarks were the norm might</p> <p>12 harm a students's mental health?</p> <p>13 A. Yes, and unfortunately we do see</p> <p>14 that quite frequently across all of our</p> <p>15 community, especially as it's used on social</p> <p>16 media indicated in bullet number two.</p> <p>17 Q. All right. So the comments that</p> <p>18 people are posting on social media where, in the</p> <p>19 TUSD schools, the norm is racist remarks, jokes,</p> <p>20 and gestures, that could also harm students'</p> <p>21 mental health?</p> <p>22 MR. CUTLER: Object to form.</p> <p>23 THE WITNESS: Can you repeat the</p> <p>24 question?</p> <p>25 ///</p>

<p style="text-align: right;">Page 288</p> <p>1 BY MS. DEGTYAREVA:  2 Q. You reference social media here.  3 Are you talking about racist remarks, jokes, and  4 gestures that TUSD students might post on social  5 media? Is that correct?  6 MR. CUTLER: Object to form.  7 Misstates testimony.  8 You can answer.  9 THE WITNESS: Yes, we do see quite a  10 bit of racist posts and jokes posted  11 across multi social media platforms.  12 BY MS. DEGTYAREVA:  13 Q. And you would agree that a culture  14 where racist remarks were the norm, again  15 whether that's on social media, in person, or  16 really anywhere, that could be disruptive to the  17 learning environment?  18 A. Absolutely.  19 Q. Does TUSD have data on exactly how  20 many of its students have experienced some form  21 of racism on TUSD's campuses?  22 A. That would be pretty difficult to  23 ascertain. Again, not everything is reportable  24 and documented. If it rises to the level of  25 potential harassment, that may be documented</p>	<p style="text-align: right;">Page 290</p> <p>1 Q. So for 50 or 60 years TUSD was  2 basically under court supervision to make sure  3 that it would have eradicated discriminatory  4 practices across the district?  5 A. Correct, and we were released from  6 court supervision two years ago.  7 Q. Actually you were released from  8 court supervision earlier this year in January  9 of 2025, right?  10 A. We -- the official, the Ninth  11 Circuit Court of Appeals upheld that ruling, but  12 we have been out from direct court supervision,  13 now this is the second school year.  14 Q. And does TUSD agree that another  15 thing that can negatively impact students'  16 academic performance is if the student is  17 chronically absent?  18 A. Yes.  19 Q. Because if a student is chronically  20 absent, they have less access to the educational  21 opportunities in the classroom, right?  22 A. Correct.  23 Q. Chronic absenteeism can also lead to  24 higher dropout rates, right?  25 A. Correct.</p>
<p style="text-align: right;">Page 289</p> <p>1 within the discipline platform, we might be able  2 to collect that data.  3 Again, in MTSS the teachers are  4 noting observational data of remarks that  5 students are making, we could potentially. But  6 no, I don't believe that we would have any  7 definitive data that would be able to point to a  8 specific number of how many students have been  9 engaged in any sort of racial discrimination.  10 Q. Are you familiar with TUSD's  11 desegregation litigation?  12 A. I am.  13 Q. Are you familiar with the unitary  14 status plan?  15 A. I am.  16 Q. Can you please explain what that is?  17 A. So the Tucson Unified School  18 District has been under a desegregation order 50  19 or 60 years. The original complaint was around  20 discriminatory practices within the district,  21 especially with students of Hispanic descent or  22 African-American descent, and so that has driven  23 a lot of the practices that the district has had  24 to employ to ensure that they are eradicating  25 those discrimination practices.</p>	<p style="text-align: right;">Page 291</p> <p>1 Q. And if a student is chronically  2 absent, they would also have less access to any  3 of the mental and emotional health resources  4 that a school might provide?  5 A. Correct.  6 Q. So that could exacerbate mental  7 health problems?  8 A. Absolutely.  9 Q. It could also lead to a lack of  10 treatment?  11 A. It could.  12 Q. And TUSD has faced criticism for  13 allowing a large percentage of its students to  14 be chronically absent?  15 MR. CUTLER: Object to form.  16 THE WITNESS: So with an institution  17 of our size -- we are the third largest  18 school district in the state of Arizona  19 with over 40,000 students spanning a very  20 diverse population across Pima County --  21 yes, we do receive criticism in many  22 different areas.  23 However, the district does have very  24 explicit policies around trying to  25 increase absenteeism, but there's a lot of</p>

25 (Pages 288 - 291)

<p style="text-align: right;">Page 292</p> <p>1 other barriers that work against us.  2 So we definitely do have a lot of  3 resources that we try to employ to  4 eradicate that.  5 BY MS. DEGTAREVA:  6 Q. Let's take a look at a document.  7 MS DEGTAREVA: We're on Exhibit 31,  8 and this is tab 27.  9 (Tucson-30(b)(6)-Shivanonda-31 was  10 marked for identification.)  11 BY MS. DEGTAREVA:  12 Q. This is an article from August 2nd,  13 2024.  14 Do you see that?  15 A. I do.  16 Q. And it's titled Chronic Absenteeism  17 Crisis: Tucson USD teachers say district lax  18 with excessive absences.  19 Do you see that?  20 A. I do.  21 Q. Now, chronic absenteeism is defined  22 as when a student is absent 10 percent of the  23 entire school year, right?  24 A. Yes, I believe so.  25 Q. That's 18 days or more?</p>	<p style="text-align: right;">Page 294</p> <p>1 near the top, do you see where it says, "Even  2 though Shreve tried to work with the family and  3 offered solutions, he said the senior continued  4 to miss class and the district didn't intervene  5 with any form of discipline. 'It can be  6 frustrating when the system itself doesn't  7 help,' Shreve said."  8 Do you see that?  9 A. I do see that.  10 Q. Then going right below that, this is  11 quoting somebody called Lysa Nabours, who it  12 says was with TUSD for 25 years.  13 Do you see that?  14 A. I see that.  15 Q. And Ms. Nabours says, "'The district  16 needs to follow up and let the parents know that  17 this is not acceptable.'"... "There are students  18 who never make it to first period. There are  19 students who are chronically absent for half a  20 day or a full day, 25, 30 absences out of an  21 entire semester. It's at a crisis level and  22 it's huge."  23 Do you see that?  24 A. I do see that.  25 Q. In fact, according to this article,</p>
<p style="text-align: right;">Page 293</p> <p>1 A. Yes.  2 Q. Now, looking at the first page of  3 this article, it's talking about someone named  4 Kyle Shreve.  5 Do you know who that is?  6 A. I do not.  7 We have, again, 4,000 teachers and  8 certified staff, so I do not know the names of  9 all of our staff.  10 Q. And according to this article, Kyle  11 Shreve at some point taught at TUSD?  12 MR. CUTLER: Object to form.  13 THE WITNESS: I cannot confirm or  14 deny.  15 BY MS. DEGTAREVA:  16 Q. So looking at the article, it says,  17 "One of his high school students, a senior,  18 racked up around 90 absences last school year  19 and was failing the class."  20 Do you see that?  21 A. Which page?  22 Q. Excuse me, on the first page, at the  23 very bottom of the first page.  24 A. Okay. Yes, I see that.  25 Q. And then going to the second page,</p>	<p style="text-align: right;">Page 295</p> <p>1 in the 2023 to 2024 school year, TUSD's chronic  2 absenteeism rate was at 34 percent. And that's  3 at the very bottom of this page, page 2.  4 A. Correct. Which is also on par with  5 our other larger school districts, Amphi at 38  6 and Sunnyside at 47 percent.  7 It is a pervasive and chronic  8 difficult area in the state of Arizona. The  9 state of Arizona also has completely eliminated  10 any funding for truancy, and so there are no --  11 any legal ramifications any longer in the state  12 of Arizona, so there's no consequences for  13 parents, which is another barrier that drives  14 chronic absenteeism.  15 Q. So lack of funding is increasing  16 this problem?  17 A. Absolutely.  18 Q. And if you go to page 3 of this  19 article, you'll see near the middle of the page  20 we have another quote from Ms. Nabours. It  21 says, "But when the pandemic hit, 'We dropped  22 all our rules. Everybody could come and go.'  23 "The district, she said, is still  24 lax on enforcement."  25 Do you see that?</p>

26 (Pages 292 - 295)

<p style="text-align: right;">Page 296</p> <p>1 A. I do. And I would say this is the 2 opinion of one out of 4,000 teachers within our 3 school district. 4 Also within this article it does 5 quote our school district policies. We do have 6 very stringent attendance policies within the 7 district to enforce as much as possible. 8 However, when we look at disciplinary action, 9 it's hard to take disciplinary action on a 10 student who is absent. Suspending a student who 11 has been chronically absent is going to just 12 exacerbate the problem. 13 So without support from parents and 14 community, it becomes very difficult to enforce 15 those policies. 16 Q. You would agree, as you said, that 17 chronic absenteeism is a serious problem in 18 Tucson Unified School District? 19 A. And the state of Arizona, 20 absolutely. 21 Q. And the state of Arizona. 22 Now let's take a look at another 23 document. 24 MS. DEGTYAREVA: This is Exhibit 32, 25 and it's tab 28.</p>	<p style="text-align: right;">Page 298</p> <p>1 audits. I'm aware that those were completed, 2 yes. 3 Q. Now, if you go to page 2 of this 4 article. 5 MR. CUTLER: Take your time to read 6 it. 7 THE WITNESS: Yeah, I'm going to go 8 ahead and read it, just so that way -- 9 BY MS. DEGTYAREVA: 10 Q. Go ahead. 11 MR. CUTLER: It's five pages. 12 (Witness reviewing document.) 13 THE WITNESS: Okay. 14 BY MS. DEGTYAREVA: 15 Q. Okay. So going to page 2 of this 16 article, in the paragraph starting with "In 17 Tucson USD's case," do you see where it says, 18 "In Tucson USD's case, it was ordered to repay 19 nearly \$280,000 in 2021 for 'misreporting the 20 enrollment data of 250 students' and 'failing to 21 properly maintain some required documentation' 22 over three years." 23 Do you see that? 24 A. I do. 25 Q. Now, do you agree that if TUSD</p>
<p style="text-align: right;">Page 297</p> <p>1 (Tucson-30(b)(6)-Shivanonda-32 was 2 marked for identification.) 3 BY MS. DEGTYAREVA: 4 Q. Now, this is an article again from 5 August 27, 2024. 6 Do you see that? 7 A. I do. 8 Q. And at the top the title of the 9 article is Audits Reveal Tucson USD told to 10 repay state funds, could risk of losing more 11 over student attendance reporting. 12 Do you see that? 13 A. I do see that. 14 Q. Now, looking at the first page, the 15 second -- or, excuse me, the third paragraph of 16 this article, it talks about two audit reports 17 on student attendance conducted by the Arizona 18 Department of Education in 2021 and TUSD in 19 April 2024. 20 Do you see that? 21 A. I do. 22 Q. Are you familiar with those audit 23 reports? 24 A. I am generally aware. I cannot 25 speak to all of the findings in both of those</p>	<p style="text-align: right;">Page 299</p> <p>1 accurately reported how many students were 2 chronically absent and it turned out that more 3 students were chronically absent, it could lose 4 some funding? 5 MR. CUTLER: Object to form. 6 Foundation. 7 THE WITNESS: According to this 8 article, that is what this article is 9 stating, so attendance is directly 10 correlated to funding. 11 BY MS. DEGTYAREVA: 12 Q. And the district was given three 13 years to fix all of the issues that the Arizona 14 Department of Education found in the 2021 audit, 15 right? 16 A. According to this article, yes, 17 that's what it says. 18 Q. So in 2024 the district conducted 19 its own internal audit to see if the issues had 20 been resolved, right? 21 A. Yes. 22 Q. And again on page 2 it says, "The 23 follow-up internal 2024 audit shows problems 24 persist pointing to a litany of serious issues 25 in a random sample of 420 student records."</p>

27 (Pages 296 - 299)

<p style="text-align: right;">Page 300</p> <p>1 Right?</p> <p>2 A. That is what it says, yes.</p> <p>3 Q. So that internal audit in 2024 found</p> <p>4 that the problems continued?</p> <p>5 MR. CUTLER: Object to form.</p> <p>6 Foundation.</p> <p>7 THE WITNESS: According to this</p> <p>8 article, it shows that the problems</p> <p>9 persisted.</p> <p>10 BY MS. DEGTAREVA:</p> <p>11 Q. And then later down on this same</p> <p>12 page, talking about the internal 2024 audit, it</p> <p>13 says it "listed more concerns - 'chronic</p> <p>14 tardiness,' 'high level of absences,' and 'no</p> <p>15 recorded involvement addressing the noted issues</p> <p>16 from administration, MTSS, or dropout</p> <p>17 prevention."</p> <p>18 Right?</p> <p>19 A. That is what the article says.</p> <p>20 Q. Those were TUSD's own internal audit</p> <p>21 findings, right?</p> <p>22 MR. CUTLER: Object to form.</p> <p>23 Foundation.</p> <p>24 THE WITNESS: It doesn't specify.</p> <p>25 It says, "The auditor noted more</p>	<p style="text-align: right;">Page 302</p> <p>1 board meeting.</p> <p>2 Q. Now, the title of this board agenda</p> <p>3 item form is "Tucson Unified School District</p> <p>4 Counseling Vacancy Plan - Contracting Social</p> <p>5 Workers to fill Vacancies."</p> <p>6 Do you see that?</p> <p>7 A. I do.</p> <p>8 Q. Did you submit this board agenda</p> <p>9 item form?</p> <p>10 A. I did.</p> <p>11 Q. And under Item Type, it's marked as</p> <p>12 "Consent."</p> <p>13 What does that mean?</p> <p>14 A. That means that we are asking for</p> <p>15 approval or consent from the board to make the</p> <p>16 initiative that we are asking occur.</p> <p>17 Q. And then under Purpose, it says,</p> <p>18 "The purpose of this agenda item is gain consent</p> <p>19 from the TUSD Governing Board to utilize the</p> <p>20 current SAVE Contract to contract Social Workers</p> <p>21 to serve as school counselors for the 2nd</p> <p>22 semester of school year 22-23."</p> <p>23 Right?</p> <p>24 A. Yes.</p> <p>25 Q. What is the "SAVE Contract"?</p>
<p style="text-align: right;">Page 301</p> <p>1 concerns." So could be either of the</p> <p>2 audits.</p> <p>3 BY MS. DEGTAREVA:</p> <p>4 Q. All right. So either TUSD</p> <p>5 internally or the Arizona Department of</p> <p>6 Education found all of these concerns, correct?</p> <p>7 MR. CUTLER: Object to form.</p> <p>8 Foundation.</p> <p>9 THE WITNESS: According to this</p> <p>10 article, yes.</p> <p>11 MS. DEGTAREVA: Okay. Let's mark</p> <p>12 as Exhibit 33 tab 60.</p> <p>13 (Tucson-30(b)(6)-Shivanonda-33 was</p> <p>14 marked for identification.)</p> <p>15 BY MS. DEGTAREVA:</p> <p>16 Q. Ms. Shivanonda, just looking at the</p> <p>17 metadata sheet at the end, you see that under</p> <p>18 Custodians your name is listed?</p> <p>19 A. I do.</p> <p>20 Q. Okay. Looking at the first page,</p> <p>21 this is a board agenda item form, right?</p> <p>22 A. Correct.</p> <p>23 Q. What is a board agenda item form?</p> <p>24 A. So the form that we submit to</p> <p>25 request an agenda item be placed on a governing</p>	<p style="text-align: right;">Page 303</p> <p>1 A. So within the school district there</p> <p>2 are multiple -- in procurement there are</p> <p>3 multiple ways that we are able to have approval</p> <p>4 for different vendors. And so the SAVE Contract</p> <p>5 is a larger contract that was awarded amongst</p> <p>6 multiple school districts, so then that way we</p> <p>7 don't necessarily have to go through the full</p> <p>8 request for proposal process to identify a</p> <p>9 vendor to meet our needs.</p> <p>10 Q. So was the SAVE Contract -- is that</p> <p>11 a funding source, or am I misunderstanding?</p> <p>12 A. So, no, the contract would be -- the</p> <p>13 procurement process is around identifying</p> <p>14 potential vendors to provide services to the</p> <p>15 district. The funding source would come from</p> <p>16 individual departments and whether or not they</p> <p>17 have the funding source to access to use that.</p> <p>18 But the contract itself is just an</p> <p>19 agreement that the district could -- has vetted</p> <p>20 the particular vendor and that we could move</p> <p>21 forward with using that vendor.</p> <p>22 Q. And so you needed board approval to</p> <p>23 use the SAVE Contract?</p> <p>24 A. Correct.</p> <p>25 Q. Turning to page 2 of this document,</p>

<p style="text-align: right;">Page 304</p> <p>1 which is ending in Bates 271, there's a section 2 titled Description and Justification. 3 Do you see that? 4 A. I do. 5 Q. And it says that, "TUSD currently 6 has 18 school counselor vacancies. Having a 7 school counselor vacancy at a school site places 8 a hardship on the site to adequately support the 9 social emotional, behavioral, and academic needs 10 of students." 11 Do you see that? 12 A. I do. 13 Q. Do you agree that school counselor 14 vacancies place a hardship on the district's 15 ability to support the mental health of its 16 students? 17 A. I do. 18 Q. How long has TUSD had counselor 19 vacancies? 20 A. At this particular level, it depends 21 on year by year. We generally do have some 22 attrition, and generally we'll have a certain 23 number of vacancies per year. 24 Q. Are there currently any counselor 25 vacancies?</p>	<p style="text-align: right;">Page 306</p> <p>1 work candidates going into those fields, and so 2 we're seeing a reduction in new teachers, 3 counselors, social workers, etcetera coming out 4 of college prep classes to be eligible for 5 employment in school districts. 6 Q. Is that a problem TUSD is still 7 having today? 8 A. Not at the same rate as it was at 9 the need of this board presentation. 10 Q. It's at a lower rate? 11 A. It's at a lower rate, mm-hmm. 12 Q. Now, this proposal was for a 13 temporary solution to fill the positions with 14 contract licensed social workers, right? 15 A. Correct. 16 Q. So what's the difference between a 17 qualified counselor and a contract licensed 18 social worker? 19 A. In the state of Arizona a school 20 counselor -- there's a specific certification 21 for a school counselor, whereas a social worker 22 has a social work certificate. So the 23 requirements for being a school counselor are 24 different than a teacher, different than a 25 social worker, so in order to obtain a school</p>
<p style="text-align: right;">Page 305</p> <p>1 A. We do currently have two counselor 2 vacancies, yes. 3 Q. Now, later on in the second 4 paragraph in the same section, Description and 5 Justification, it says, "The TUSD School 6 Counseling Department has collaborated with the 7 TUSD Human Resources Department and the 8 University of Arizona in its recruitment 9 efforts, however unfortunately there is an 10 insufficiency of qualified candidates in Tucson 11 and Arizona to fill the counseling vacancies in 12 TUSD." 13 Do you see that? 14 A. I do. 15 Q. So an additional problem that TUSD 16 was having here in addition to having the 17 vacancies was that it just couldn't find 18 qualified candidates to fill those vacancies? 19 A. Correct. 20 Q. And has this been an ongoing problem 21 of having problems finding qualified candidates? 22 A. Not -- only in the most recent 23 couple of years. We are starting to see -- as a 24 community we see less and less teacher 25 candidates, school counseling candidates, social</p>	<p style="text-align: right;">Page 307</p> <p>1 counseling certificate, those requirements are 2 more strenuous than that of a social worker. 3 The district also might engage 4 social workers -- clinical social workers to 5 fill social work vacancies within the district. 6 However, the district -- the hiring processes 7 for school counselors is that to be a school 8 counselor you have to be a certificated school 9 counselor, which is a very specific master's 10 program outside of maybe a traditional therapist 11 or a counselor in the community. There would be 12 additional requirements that they would have to 13 take in order to be eligible for a school 14 counselor position. 15 Q. So the temporary solution for the 16 contract licensed social worker, they were 17 people that hadn't undergone these additional 18 certification requirements? 19 A. Correct. 20 Q. Let's take a look at another 21 document. 22 MS. DEGTYAREVA: This is tab 34 -- 23 excuse me, Exhibit 34. I'm going to mark 24 it as Exhibit 34. It's tab 61A. 25 ///</p>



<p style="text-align: right;">Page 308</p> <p>1 (Tucson-30(b)(6)-Shivanonda-34 was 2 marked for identification.) 3 BY MS. DEGTYAREVA: 4 Q. Now, this is -- looking down in the 5 middle of the first page which ends in Bates 6 108 -- 7 A. Can I read the entirety of the 8 document first? 9 Q. Yeah. Sure. 10 (Witness reviewing document.) 11 A. Okay. 12 Q. Let's just go to the second page of 13 this document ending in Bates 109. At the very 14 bottom of the page, the first e-mail in this 15 chain is from you October 6, 2022, right? 16 A. Yes. 17 Q. And you say, "The counseling 18 department is developing a presentation to the 19 Governing Board to ask to contract Social 20 Workers at schools with counseling vacancies." 21 Is that referring to this same board 22 agenda item we just looked at? 23 A. Yes. 24 Q. And then you say, "Below is a list 25 of our current schools with vacancies."</p>	<p style="text-align: right;">Page 310</p> <p>1 administrator, maybe a dean, maybe another 2 position generally would potentially absorb some 3 of those duties as they're a vacancy, but due to 4 the severity of the need we were finding that 5 that was just overburdening the system. 6 So we were trying to identify 7 additional supports and resources as a stopgap 8 in this critical time of need, and we were also 9 -- again, what this doesn't show is that, again, 10 through those -- that soft data, those 11 conversations around the social emotional needs 12 at our schools, really trying to highlight the 13 fact that that is needed and that school 14 counselors are vital to our school campuses. 15 Q. Now, in this chart of 17 schools, 16 were there any schools that had no on-site 17 counselors? 18 A. So these schools -- so Tucson High 19 and Pueblo -- most of our high schools do have 20 multiple counselors due to their size. Our 21 current ratio is one counselor for every 500 22 students. 23 So most of these elementary schools 24 there would be a single counselor, and so with 25 those elementary schools, yes, that would have</p>
<p style="text-align: right;">Page 309</p> <p>1 And you include a chart of schools 2 that had vacancies, right? 3 A. Yes. 4 Q. And you ask for some discipline 5 trend data for these schools, right? 6 A. Yes. 7 Q. You say, "We're trying to make a 8 case as to why counselors are needed at these 9 schools." 10 Right? 11 A. Yes. 12 Q. So why did you -- I guess if there 13 were counselor vacancies, why did you have to 14 make a case as to why counselors were needed? 15 A. So this would be -- this whole 16 initiative was out of the norm, it was more of 17 an extenuating circumstance. So we generally 18 don't have the process of contracting out versus 19 trying to find qualified candidates, and so in 20 order to really hone in on the request and the 21 ask and the spend, we do -- the board does like 22 us to have data to back up the reasoning for 23 that. 24 Oftentimes and the way schools 25 generally work is we tend to just absorb, so an</p>	<p style="text-align: right;">Page 311</p> <p>1 left a complete vacancy, whereas -- oh, and then 2 Secrist and Wakefield both only have one 3 counselor due to their enrollment size. And 4 then Roberts Naylor was missing one, they 5 already had one. Roskrige needed an additional. 6 And Safford needed -- they did not have anyone 7 there so, again, depending upon enrollment size, 8 they may or may not have had a counselor already 9 there. 10 Q. Now, you reached out to Anna 11 Schwartz Warmbrand to ask for this discipline 12 data, right? 13 A. Correct. 14 Q. Can you remind us, who is Anna 15 Schwartz Warmbrand? 16 A. She is the director of student 17 relations, and her department oversees 18 discipline, restorative practices, and PBIS. 19 Q. And then if you go to the first 20 page, 108, you'll see an e-mail from Anna 21 Schwartz Warmbrand, right, and it says, "Here 22 are the reports you requested to help you with 23 the board report." 24 Right? 25 A. Yes.</p>

<p style="text-align: right;">Page 312</p> <p>1 Q. So she sent you back some reports?</p> <p>2 A. Yes.</p> <p>3 Q. And at the very top you'll see it</p> <p>4 says Attachments, and there are a number of PDFs</p> <p>5 attached with various names of the schools.</p> <p>6 A. Yes.</p> <p>7 Q. So let's take a look at one of those</p> <p>8 reports.</p> <p>9 MS. DEGTYAREVA: Let's mark as</p> <p>10 Exhibit 35 tab 61B.</p> <p>11 (Tucson-30(b)(6)-Shivanonda-35 was</p> <p>12 marked for identification.)</p> <p>13 BY MS. DEGTYAREVA:</p> <p>14 Q. So if you take a look at the</p> <p>15 metadata sheet at the end, you'll see under File</p> <p>16 Name it says "Pueblo.pdf."</p> <p>17 A. Yes.</p> <p>18 Q. And is Pueblo one of those schools</p> <p>19 that had some counselor vacancies, right?</p> <p>20 A. Yes.</p> <p>21 Q. All right. So this is the way the</p> <p>22 report was produced to us, it's a little bit</p> <p>23 confusing, but if you take a look, the table</p> <p>24 breaks across several pages, so the page ending</p> <p>25 in 111, goes on to 112, and that's sort of a</p>	<p style="text-align: right;">Page 314</p> <p>1 vape, right?</p> <p>2 A. It appears so.</p> <p>3 Q. There's some instances of</p> <p>4 aggression, right?</p> <p>5 A. Yes.</p> <p>6 Q. Some weapons and dangerous items,</p> <p>7 right?</p> <p>8 A. Yes.</p> <p>9 Q. Do you see improper use of</p> <p>10 technology as a violation category anywhere in</p> <p>11 this table?</p> <p>12 A. I do not explicitly, no.</p> <p>13 Q. Let's go on to the next document.</p> <p>14 This is Exhibit 36, and it's going to be tab 29.</p> <p>15 (Tucson-30(b)(6)-Shivanonda-36 was</p> <p>16 marked for identification.)</p> <p>17 BY MS. DEGTYAREVA:</p> <p>18 Q. Now, if you look at the metadata</p> <p>19 sheet at the end, you'll see that the custodian</p> <p>20 has your name, right?</p> <p>21 A. Yes.</p> <p>22 Q. The date is December 1, 2022, right?</p> <p>23 A. Yes.</p> <p>24 Q. And the file name is Updated</p> <p>25 Counseling Board Presentation_Contracting Social</p>
<p style="text-align: right;">Page 313</p> <p>1 continuation of that table.</p> <p>2 Does that make sense?</p> <p>3 A. Yes.</p> <p>4 Q. Okay, great.</p> <p>5 So is this discipline data from</p> <p>6 Synergy?</p> <p>7 A. Yes.</p> <p>8 Q. And you'll see, for example, on</p> <p>9 page 112 there's a Violation category, right?</p> <p>10 A. Correct.</p> <p>11 Q. So does that refer to the type of</p> <p>12 violation of the code of conduct that was</p> <p>13 reported in Synergy?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. So just kind of looking</p> <p>16 through the report on page 112, the other</p> <p>17 violations are on page ending in 114, 116, 118,</p> <p>18 I believe that's it. Take a moment to look at</p> <p>19 those.</p> <p>20 (Witness reviewing document.)</p> <p>21 A. Okay.</p> <p>22 Q. There are a lot of instances here of</p> <p>23 alcohol, tobacco, and other drugs, right?</p> <p>24 A. Yes.</p> <p>25 Q. A lot of those specifically specify</p>	<p style="text-align: right;">Page 315</p> <p>1 Workers, right?</p> <p>2 A. Yes.</p> <p>3 Q. So is this the presentation that you</p> <p>4 ended up giving to the board in December of 2022</p> <p>5 on this issue of counselor vacancies?</p> <p>6 A. I believe so. I know that we had a</p> <p>7 couple of iterations, but this does look like</p> <p>8 this was the presentation that was presented.</p> <p>9 Q. Now, take a look at the third page</p> <p>10 of the document, it's ending in Bates 643. I</p> <p>11 think, as you mentioned, it says TUSD's ratio of</p> <p>12 school counselors is 500 to 1?</p> <p>13 A. Correct.</p> <p>14 Q. With some schools without a</p> <p>15 counselor and some that are over 500, right?</p> <p>16 A. Correct.</p> <p>17 Q. So is that consistent with your</p> <p>18 understanding at the time?</p> <p>19 A. Yes. And our ratio continues to be,</p> <p>20 and similarly, and so then the difficulty then</p> <p>21 is we only get another counselor after another</p> <p>22 increment of 500, so we may have schools that</p> <p>23 have 750 to 1.</p> <p>24 Q. This is still accurate as of today?</p> <p>25 A. Yes.</p>



<p style="text-align: right;">Page 316</p> <p>1 Q. Now, right above that you see where 2 it says, "The American School Counselor 3 Association recommends a ratio of 250 to 1 to 4 support the whole child's access to academic 5 advisement, postsecondary readiness, and mental 6 health/social emotional resources for 7 individuals, small groups, and whole classes," 8 right? 9 A. Yes. 10 Q. So the American School Counselor 11 Association recommends a ratio of 250 students 12 to 1 counselor? 13 A. Correct. 14 Q. And the reason they recommend that 15 ratio is because it's important to support 16 student mental health? 17 A. Correct. 18 Q. Do you agree that not having access 19 to a counselor can impact a student's mental 20 health? 21 A. Absolutely. 22 Q. Now I'd like to ask you a couple of 23 questions about the COVID-19 pandemic. 24 During the COVID-19 pandemic, TUSD 25 schools were closed to in-person learning from</p>	<p style="text-align: right;">Page 318</p> <p>1 that year, with then a full return in the 2 following year, with the exception of the 3 creation of TUVa, the Tucson Unified Virtual 4 Academy, that some of our families chose to 5 continue with virtual instruction. 6 Q. Does TUSD agree that the COVID-19 7 pandemic had a significant effect on student 8 mental health? 9 A. Yes. COVID-19 pandemic, yes, had a 10 significant impact. It reduced the amount of 11 opportunities for students to learn social 12 skills, to be connected with their peers. That 13 also increased the access and opportunity to 14 devices, social media, while they were at home 15 which then also continued as they returned to 16 campus. 17 Q. Well, and there were also stressors 18 from the pandemic that had nothing to do with 19 devices, right? 20 A. Correct. 21 Q. For example, students could have 22 been concerned about their own health and safety 23 due to COVID? 24 A. Yes. 25 MR. CUTLER: Object to form.</p>
<p style="text-align: right;">Page 317</p> <p>1 March 2020 through the end of the 2020 school 2 year, is that right? 3 A. That is correct. 4 Q. And there were COVID lockdowns 5 nationwide, right? 6 A. Yes. 7 Q. So then TUSD had a hybrid learning 8 environment for the 2020 to 2021 school year, 9 right? 10 A. There were certain school sites 11 that, yes, had availability for hybrid for 12 various reasons, yes. 13 Q. And were some schools still 14 completely closed to in-person learning? 15 A. Yes. 16 Q. So then it was in the 2021 to 2022 17 school year that TUSD began to fully return to 18 in-person learning, right? 19 A. Yes, that was the school year, there 20 was a phased implementation with precautions in 21 place, yes. 22 Q. So when did all schools return fully 23 to in-person learning? 24 A. It's my understanding that in the 25 spring of 2022, so we were phasing in through</p>	<p style="text-align: right;">Page 319</p> <p>1 BY MS. DEGTAREVA: 2 Q. They could have been concerned about 3 the health and safety of loved ones who might 4 have been high risk due to COVID, right? 5 A. Yes. 6 Q. And as you mentioned, students were 7 limited in their ability to engage with other 8 people because of the lockdowns? 9 A. Correct. 10 Q. Now let's take a look at another 11 document. 12 MS. DEGTAREVA: This is going to be 13 Exhibit -- 14 MR. RICE: 37. 15 MS. DEGTAREVA: -- 36? 16 MR. RICE: 37. 17 MS. DEGTAREVA: -- 37, and this is 18 tab 30. 19 (Tucson-30(b)(6)-Shivanonda-37 was 20 marked for identification.) 21 BY MS. DEGTAREVA: 22 Q. This is the Health Services Budget 23 Proposal for AY2024-2025, right? 24 A. I am not familiar with this 25 document, but according to the title, it's what</p>

<p style="text-align: right;">Page 320</p> <p>1 it looks like.</p> <p>2 Q. And if you turn to the page ending</p> <p>3 in 694, at the bottom do you see there's a</p> <p>4 section titled Increasing Number of Mental</p> <p>5 Health Issues in Schools?</p> <p>6 A. I can see that.</p> <p>7 Q. And it says, "As a result of the</p> <p>8 pandemic, children and adolescents less than or</p> <p>9 equal to 18 years of age, depression 31 percent,</p> <p>10 anxiety 31 percent, and sleep disturbance</p> <p>11 42 percent have prevailed in our school aged</p> <p>12 youth."</p> <p>13 Do you see that?</p> <p>14 A. I see that.</p> <p>15 Q. That was the finding of TUSD's</p> <p>16 health services department?</p> <p>17 MR. CUTLER: Object to form.</p> <p>18 Foundation.</p> <p>19 THE WITNESS: According to this</p> <p>20 document, yes.</p> <p>21 BY MS. DEGTYAREVA:</p> <p>22 Q. Now, we've talked about a lot of</p> <p>23 different factors that could affect mental</p> <p>24 health, and another factor that could affect</p> <p>25 students' mental health is just the quality of</p>	<p style="text-align: right;">Page 322</p> <p>1 Q. Who is Kate Straub?</p> <p>2 A. She is the health assistant of</p> <p>3 Pueblo High School.</p> <p>4 Q. And what is a health assistant?</p> <p>5 A. In TUSD we do not have the financial</p> <p>6 means to have a registered nurse at every</p> <p>7 school, so there are registered nurse -- a</p> <p>8 handful of registered nurses within the district</p> <p>9 that support and supervise a health assistant at</p> <p>10 each school. So the health assistant is then</p> <p>11 the individual that provides health services in</p> <p>12 the health office at the school.</p> <p>13 Q. Is that the same as a counselor, or</p> <p>14 different?</p> <p>15 A. That is different than a counselor.</p> <p>16 Q. So in this e-mail she says -- Kate</p> <p>17 Straub says, "Dear Julie, I am deeply concerned</p> <p>18 about the decision to remove Casas as the</p> <p>19 partner agency with PHS and replace it with</p> <p>20 La Frontera."</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. What does PHS refer to?</p> <p>24 A. Pueblo High School.</p> <p>25 Q. And Casas, was that Casas de los</p>
<p style="text-align: right;">Page 321</p> <p>1 mental health care that they receive, right?</p> <p>2 A. Yes.</p> <p>3 Q. In other words, if they seek</p> <p>4 treatment, but it's low quality treatment, it's</p> <p>5 ineffective, that could affect their mental</p> <p>6 health?</p> <p>7 A. It could.</p> <p>8 Q. Okay. Let's take a look at</p> <p>9 exhibit -- what will be marked as Exhibit 38,</p> <p>10 and this is tab 62.</p> <p>11 (Tucson-30(b)(6)-Shivanonda-38 was</p> <p>12 marked for identification.)</p> <p>13 BY MS. DEGTYAREVA:</p> <p>14 Q. Do you need a moment to read through</p> <p>15 this?</p> <p>16 A. Yes, please.</p> <p>17 (Witness reviewing document.)</p> <p>18 A. Okay.</p> <p>19 Q. So let's go to the page ending in</p> <p>20 Bates 903 which has the first e-mail in this</p> <p>21 chain.</p> <p>22 A. Okay.</p> <p>23 Q. This is an e-mail from Kate Straub</p> <p>24 to you on August 12, 2022, right?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 323</p> <p>1 Ninos?</p> <p>2 A. It is.</p> <p>3 Q. So was that one of the partner</p> <p>4 agencies that TUSD had been using to refer</p> <p>5 students for mental health services?</p> <p>6 A. Yes.</p> <p>7 Q. So at some point TUSD decided to</p> <p>8 stop using Casas?</p> <p>9 A. No, we didn't stop using Casas de</p> <p>10 los Ninos. As you'll see in the rest of the</p> <p>11 e-mail, around that time Casas de los Ninos was</p> <p>12 struggling with staffing and so they were unable</p> <p>13 to receive any referrals for an entire fourth</p> <p>14 quarter, and as such to be responsive to the</p> <p>15 needs.</p> <p>16 That is when we determined that we</p> <p>17 would also communicate and collaborate with</p> <p>18 additional behavioral health agencies, so that</p> <p>19 we had to look at the needs of the district as a</p> <p>20 whole and the capacity of our behavioral health</p> <p>21 agencies and then had to reassign a few schools</p> <p>22 to meet those needs.</p> <p>23 Q. Got it.</p> <p>24 So for this school, due to sort of a</p> <p>25 lack of resources or lack of availability from</p>

<p style="text-align: right;">Page 324</p> <p>1 Casas, you had to reassign the school to  2 La Frontera?  3 A. Correct.  4 Q. And in this e-mail Kate Straub talks  5 about some complaint that she has heard about  6 La Frontera, right?  7 A. Yes.  8 Q. She says, "La Frontera did not  9 return calls, that they had such a high turnover  10 of staff that every time their child went for a  11 session they had a new provider (which was very  12 traumatic for the student and made them  13 distrustful and unwilling to open up), that they  14 cancelled appointments without apology and  15 without telling parents, and that children  16 waiting weeks to be seen due to lack of  17 providers, cancelled appointments or other  18 issues (long after the traumatic incident which  19 sought them to seek care if the first place)."  20 Right?  21 A. Those are concerns she had heard  22 about from La Frontera. I cannot confirm or  23 deny whether or not those instances actually  24 occurred.  25 Q. She was the health assistant in the</p>	<p style="text-align: right;">Page 326</p> <p>1 right?  2 A. That's what it says.  3 Q. Would you agree that those are also  4 barriers that students and families can face to  5 getting necessary mental health treatment?  6 A. Yes, which is why we continue to  7 adjust our referral practices to identify the  8 best referral systems to be able to provide that  9 support.  10 Q. And would you agree that if students  11 aren't able to access necessary mental health  12 treatment due to such barriers, that could make  13 their existing problems worse?  14 A. Yes.  15 Q. So then on behalf of her school  16 community, Kate Straub asked you to keep Casas  17 as a provider instead of switching to  18 La Frontera, right?  19 A. She did.  20 Q. But you weren't able to accommodate  21 that request?  22 A. Correct.  23 Q. And if you go to the page ending  24 903, you'll see -- or starting on 902, you'll  25 see your response to Kate Straub, right?</p>
<p style="text-align: right;">Page 325</p> <p>1 school and those were complaints that she had  2 heard?  3 A. Correct.  4 Q. Going to the next page, 904, Kate  5 Straub also lists some of the barriers that she  6 perceives exist to students getting necessary  7 mental health treatment, right?  8 A. That is, yes, the gist of her  9 e-mail.  10 Q. So specifically if we look at the  11 second paragraph on the page ending in Bates  12 904, in the middle of that paragraph she says,  13 "Many of our neediest families are Spanish  14 speaking, are unaware mental health services  15 exist, and then must also be persuaded to  16 overcome cultural stigma surrounding mental  17 illness to seek services from a  18 stranger/institution."  19 A. That is accurate. Those are some  20 barriers that we do see in our system.  21 Q. Then she says, "Those families that  22 overcome those barriers then face the arduous  23 and time-consuming process of registration.  24 Often these families don't get paid if they  25 don't work, so time spent is income lost,"</p>	<p style="text-align: right;">Page 327</p> <p>1 A. Yes.  2 Q. On 903 you say, "I'm sorry to hear  3 the previous struggles with La Frontera, I can  4 assure you that our new contact and their team  5 are very responsive and have wonderful working  6 relationships with the schools they are now  7 partnered with," right?  8 A. Yes.  9 Q. This is August of 2022, right?  10 A. Yes.  11 Q. If you go to page 1 of this  12 document, which is the one ending in Bates 901,  13 you see another e-mail from Kate Straub in April  14 of 2023, right?  15 A. I do.  16 Q. And in this e-mail on April of 2023,  17 she wrote to Penny Cuffe and Joseph Gaw, right?  18 A. Yes.  19 Q. And who are they?  20 A. Joseph Gaw is the current director  21 of school services, our school health services.  22 And then Penny Cuffe is -- I believe she's the  23 program coordinator within that department.  24 Q. And Joseph Gaw ended up forwarding  25 this e-mail to you, right?</p>

<p style="text-align: right;">Page 328</p> <p>1 A. Yes.</p> <p>2 Q. So in this e-mail from April of</p> <p>3 2023, in the one, two, three, fourth paragraph,</p> <p>4 Kate Straub writes, "All my reservations about</p> <p>5 La Frontera, I raised with Shivanonda on</p> <p>6 August 12, 2022 (see original e-mail at the very</p> <p>7 bottom) have occurred. There is high staff</p> <p>8 turnover. La Frontera staff do not return</p> <p>9 calls, students go to a session and find they</p> <p>10 have a new provider which is very distressing</p> <p>11 for them, appointments are cancelled without</p> <p>12 apology, and students wait weeks to start</p> <p>13 therapy," right?</p> <p>14 A. That is, yes, her concern.</p> <p>15 Q. And you agree that if these things</p> <p>16 were true, that could impact student mental</p> <p>17 health?</p> <p>18 MR. CUTLER: Object to form.</p> <p>19 THE WITNESS: It could. And we are</p> <p>20 seeing that more and more, so there's</p> <p>21 other documents that you -- that we've</p> <p>22 reviewed today as well where there is a</p> <p>23 high number of vacancies of providers</p> <p>24 within the state of Arizona, and then as</p> <p>25 well with the lack of funding with the</p>	<p style="text-align: right;">Page 330</p> <p>1 Beliefs About Behavior Survey, right?</p> <p>2 A. Yes.</p> <p>3 Q. And going to the page ending in 285,</p> <p>4 does she appear to be sending this survey on</p> <p>5 your behalf?</p> <p>6 A. Yes.</p> <p>7 Q. So this is a survey from the social</p> <p>8 emotional learning and development department,</p> <p>9 right?</p> <p>10 A. Correct.</p> <p>11 Q. And is this a survey that you wanted</p> <p>12 teachers to fill out?</p> <p>13 A. Yes.</p> <p>14 Q. Now, going to page ending in 283,</p> <p>15 Joseph Rincon responds to this e-mail, right?</p> <p>16 A. Yes.</p> <p>17 Q. Josephine Rincon.</p> <p>18 Who is Josephine Rincon?</p> <p>19 A. From her e-mail I'm assuming she is</p> <p>20 a teacher at Pueblo High School.</p> <p>21 Q. And Josephine Rincon responded with</p> <p>22 a number of concerns about this survey, right?</p> <p>23 A. Yes.</p> <p>24 Q. So looking at the next page ending</p> <p>25 in 284, one of the things she says is, "At our</p>
<p style="text-align: right;">Page 329</p> <p>1 Jake's grant, there's high turnover at all</p> <p>2 of our behavioral health agencies.</p> <p>3 BY MS. DEGTYAREVA:</p> <p>4 Q. Does TUSD still use La Frontera as</p> <p>5 one of the providers that it refers students to?</p> <p>6 A. We do.</p> <p>7 Q. Let's take a look at another</p> <p>8 document. This is going to be Exhibit 39, and</p> <p>9 it's tab 63.</p> <p>10 (Tucson-30(b)(6)-Shivanonda-39 was</p> <p>11 marked for identification.)</p> <p>12 BY MS. DEGTYAREVA:</p> <p>13 Q. Do you need a moment to review this</p> <p>14 document?</p> <p>15 A. Yes, please.</p> <p>16 (Witness reviewing document.)</p> <p>17 A. Okay.</p> <p>18 Q. Okay. Let's go to the page ending</p> <p>19 in Bates 284, and you'll see an e-mail from</p> <p>20 Leslie Lenhart.</p> <p>21 A. Yes.</p> <p>22 Q. Who is that?</p> <p>23 A. She was the previous director of</p> <p>24 communications.</p> <p>25 Q. And the subject is Input Requested -</p>	<p style="text-align: right;">Page 331</p> <p>1 site, teachers invest thousands of dollars every</p> <p>2 year trying to support our students. When there</p> <p>3 weren't enough computers, Pueblo teachers</p> <p>4 donated money to buy as many as we could."</p> <p>5 Right?</p> <p>6 A. Yes, absolutely. Many of our</p> <p>7 teachers, they work very long hours, they do</p> <p>8 spend their own money to combat all of the</p> <p>9 inadequate resources that school districts face</p> <p>10 on a regular basis, which also includes as we</p> <p>11 look at discipline data -- well, it doesn't</p> <p>12 explicitly say social media -- the majority of</p> <p>13 the things, breaking up -- teachers breaking up</p> <p>14 fights and risking their physical and mental</p> <p>15 health for kids they don't even know, we also</p> <p>16 see a through line again connecting to the</p> <p>17 social media and the use of their cellphones.</p> <p>18 Q. Let me just go back to my question.</p> <p>19 She talks about spending thousands</p> <p>20 of dollars to buy computers when there weren't</p> <p>21 enough, right?</p> <p>22 MR. CUTLER: Object to form. Asked</p> <p>23 and answered.</p> <p>24 THE WITNESS: So she stated that</p> <p>25 they invest thousands of dollars every</p>

<p style="text-align: right;">Page 332</p> <p>1 year trying to support students. That</p> <p>2 doesn't necessarily say that they spent</p> <p>3 thousands of dollars to buy computers.</p> <p>4 That was one example that some Pueblo</p> <p>5 teachers donated money.</p> <p>6 BY MS. DEGTAREVA:</p> <p>7 Q. And so she's raising a concern, as</p> <p>8 you stated, about being underfunded, right, not</p> <p>9 having enough resources?</p> <p>10 A. Correct.</p> <p>11 Q. She also, I think, talks about</p> <p>12 another concern you raised which is teachers</p> <p>13 being overworked, right?</p> <p>14 A. Yes.</p> <p>15 Q. So she says right after that,</p> <p>16 "Teachers are covering classes, so students</p> <p>17 don't have substitutes with little training.</p> <p>18 That means they give up their planning periods</p> <p>19 which means they give up time for their own</p> <p>20 families because what doesn't get done at work</p> <p>21 must get done at home," right?</p> <p>22 A. Yes.</p> <p>23 Q. She also talks about giving up a</p> <p>24 planning period to tutor a student who just</p> <p>25 returned from suspension because no one thought</p>	<p style="text-align: right;">Page 334</p> <p>1 Q. You would agree that some of the</p> <p>2 things she talks about, like substitutes having</p> <p>3 little training, again, not having enough money</p> <p>4 to buy computers, not having a plan in place for</p> <p>5 a tutoring schedule, those are not things that</p> <p>6 are related to social media?</p> <p>7 MR. CUTLER: Object to form.</p> <p>8 THE WITNESS: So not explicitly, but</p> <p>9 a roundabout way, absolutely.</p> <p>10 So we're continuously seeing</p> <p>11 teachers leaving the profession because of</p> <p>12 the ongoing increase of students that are</p> <p>13 continuously dysregulated because of the</p> <p>14 use of cellphone, because teachers are</p> <p>15 asking students to put their cellphones</p> <p>16 away and they may engage in power</p> <p>17 struggles.</p> <p>18 And teachers are frankly -- they're</p> <p>19 having a hard time with some of that</p> <p>20 because it is so addictive, that students</p> <p>21 are constantly on their cellphones. It's</p> <p>22 very difficult for teachers to be able to</p> <p>23 combat that.</p> <p>24 And then students that are engaging</p> <p>25 in aggressive practices or aggression and</p>
<p style="text-align: right;">Page 333</p> <p>1 to create a tutoring schedule prior to the</p> <p>2 child's return to help him get back on his feet.</p> <p>3 Right?</p> <p>4 A. Yes. Many teachers give up a lot of</p> <p>5 their time to provide ongoing tutoring and</p> <p>6 support.</p> <p>7 Q. And so here she's raising concern</p> <p>8 about not having sufficient planning in advance</p> <p>9 for children who are experiencing school</p> <p>10 disruptions, right?</p> <p>11 A. Correct.</p> <p>12 Q. Do you agree that teachers being</p> <p>13 overworked and schools being underfunded can</p> <p>14 impact students' academic performance?</p> <p>15 A. Absolutely. And that's the</p> <p>16 difficulty where we lie, is we are constantly</p> <p>17 underfunded and teachers are constantly</p> <p>18 overworked. And then when we constantly have to</p> <p>19 also deal with the fights and the students --</p> <p>20 the continuous barriers of students having</p> <p>21 cellphones and social media that just exacerbate</p> <p>22 that, absolutely it affects the social and</p> <p>23 emotional well-being of our students, our</p> <p>24 teachers, and our staff, and it severely taxes</p> <p>25 our system.</p>	<p style="text-align: right;">Page 335</p> <p>1 they're suspended, they're coming back.</p> <p>2 We don't have enough staffing or money or</p> <p>3 funding to be able to address all of those</p> <p>4 needs as adequately as we need to.</p> <p>5 And, again, based on our discipline</p> <p>6 data, the majority of the discipline, it</p> <p>7 does also come back to the use of</p> <p>8 cellphones, social media, and other</p> <p>9 barriers that we're seeing in our schools.</p> <p>10 BY MS. DEGTAREVA:</p> <p>11 Q. Ms. Shivanonda, has TUSD done an</p> <p>12 analysis showing why teachers are leaving the</p> <p>13 profession?</p> <p>14 A. So, again, data practices can be</p> <p>15 difficult in large school districts. So our --</p> <p>16 and we've had different directors of human</p> <p>17 resources. I do know that there has been some</p> <p>18 practices for exit surveys when staff do leave</p> <p>19 the district. I don't know in terms of that</p> <p>20 fidelity to be able to keep up with that and</p> <p>21 whether or not there's that analysis.</p> <p>22 Again, talking with teachers,</p> <p>23 talking with other professionals around at --</p> <p>24 you know, in universities, conversations where</p> <p>25 they're seeing a lack -- or a high reduction in</p>

<p style="text-align: right;">Page 336</p> <p>1 teachers going into the profession, counselors  2 going into the profession, a lot of those  3 conversations, a lot of the community does do  4 some sort of analysis.  5 I don't know that I would have  6 access to be able to produce anything, but  7 having conversations about how difficult it is  8 to be a teacher and in school systems and all of  9 the outside influences that are significantly  10 impacting are huge reasons why we're seeing  11 teachers leave the profession.  12 Q. Ms. Shivanonda, your testimony about  13 the reasons that teachers leave, that's again  14 based on your impressions from these  15 conversations you've been having?  16 A. Correct.  17 Q. And then in this e-mail this  18 teacher, Josephine Rincon, then actually  19 lists -- gives a concrete list of things that  20 she needs from TUSD to help alleviate her  21 concerns, right?  22 MR. CUTLER: Object to form.  23 THE WITNESS: She does give some  24 suggestions of actions, yes.  25 BY MS. DEGTYAREVA:</p>	<p style="text-align: right;">Page 338</p> <p>1 MS. DEGTYAREVA: We're done with  2 this document.  3 Now might be a good time for a  4 break.  5 MR. CUTLER: Sure.  6 THE VIDEOGRAPHER: We are going off  7 record. The time is 12:05.  8 (Whereupon, a luncheon recess was  9 taken.)  10  11  12  13  14  15  16  17  18  19  20  21  22  23  24  25</p>
<p style="text-align: right;">Page 337</p> <p>1 Q. And those suggestions include --  2 this is on page ending in 284 -- "more  3 counselors, social workers, custodians and  4 teachers. In the midst of a pandemic it is  5 appalling that our students are learning in  6 classrooms with 36 students and instead of  7 hiring faculties we resort to 6/5ths contracts."  8 Right?  9 A. Yes.  10 Q. You then forward this e-mail to a  11 number of people. And this is on page 283,  12 right?  13 A. Yes.  14 Q. And in the e-mail that you forward,  15 you say in the second paragraph, "I wanted to  16 bring this e-mail to your attention as it  17 depicts the feelings of I'm sure many teachers  18 in our schools."  19 Right?  20 A. Yes.  21 Q. Do you agree that these were genuine  22 problems that were impacting teachers and  23 students at the schools?  24 MR. CUTLER: Object to form.  25 THE WITNESS: Yes.</p>	<p style="text-align: right;">Page 339</p> <p>1 AFTERNOON SESSION  2 THE VIDEOGRAPHER: We're going back  3 on record. The time is 1:00 p.m.  4 BY MS. DEGTYAREVA:  5 Q. So, Ms. Shivanonda, we spent a while  6 now talking about a variety of things that can  7 impact a student's mental health. You would  8 agree that we haven't covered everything?  9 A. Correct.  10 Q. It depends on the individual  11 student? Mental health would depend on the  12 individual person, right?  13 A. Yeah, it can depend on a myriad of  14 factors, yeah. Individual people, any outside  15 influences, yeah, situations.  16 Q. It can depend on whatever is  17 happening in a student's life?  18 A. Correct.  19 MS. DEGTYAREVA: Now let's mark as  20 Exhibit -- what number?  21 MR. RICE: 40.  22 MS. DEGTYAREVA: -- 40 tab 64.  23 (Tucson-30(b)(6)-Shivanonda-40 was  24 marked for identification.)  25 ///</p>

37 (Pages 336 - 339)



<p style="text-align: right;">Page 340</p> <p>1 BY MS. DEGTAREVA:</p> <p>2 Q. Take a moment to read that if you</p> <p>3 would like.</p> <p>4 (Witness reviewing document.)</p> <p>5 A. Okay.</p> <p>6 Q. So this is an e-mail with a subject</p> <p>7 line Alice Vail Middle School/TPD, and then it's</p> <p>8 redacted, right?</p> <p>9 A. Yes.</p> <p>10 Q. And this e-mail describes an example</p> <p>11 of an incident involving a particular student,</p> <p>12 right?</p> <p>13 A. Yes.</p> <p>14 Q. The Tucson Police Department had to</p> <p>15 investigate?</p> <p>16 A. Yes.</p> <p>17 Q. And the Tucson Police Department</p> <p>18 determined that this is a case of a student that</p> <p>19 needs help for depression, right?</p> <p>20 A. According to Sergeant Hill, that was</p> <p>21 his recommendation, yes.</p> <p>22 Q. Now, there's a bulleted list here of</p> <p>23 some of the things that were going on in this</p> <p>24 student's life, right?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 342</p> <p>1 Q. They could lead to academic</p> <p>2 problems?</p> <p>3 A. Correct.</p> <p>4 Q. And the only connection that's</p> <p>5 described in this summary related to social</p> <p>6 media is that the student posted to social media</p> <p>7 and that post alerted adults that they needed</p> <p>8 help?</p> <p>9 MR. CUTLER: Object to form.</p> <p>10 Foundation.</p> <p>11 THE WITNESS: According to this</p> <p>12 report, yes, the Tucson Police Department</p> <p>13 was involved because of the connection to</p> <p>14 social media and the threats to the</p> <p>15 school.</p> <p>16 BY MS. DEGTAREVA:</p> <p>17 Q. And specifically in the captured</p> <p>18 social media, it says, "admitted to posting the</p> <p>19 first photograph 'Days of depression Someone</p> <p>20 help me.'"</p> <p>21 Right?</p> <p>22 A. Correct. He also admitted that he's</p> <p>23 the subject in the second photograph where it</p> <p>24 states, "I'm gonna shoot up the school." Which</p> <p>25 we do see quite often within the school</p>
<p style="text-align: right;">Page 341</p> <p>1 Q. And that includes that the parents</p> <p>2 are divorced, currently mother has full custody,</p> <p>3 right?</p> <p>4 A. Correct.</p> <p>5 Q. And it includes that there was one</p> <p>6 issue of reported abuse by the paternal</p> <p>7 grandfather approximately a year ago, right?</p> <p>8 A. Yes.</p> <p>9 Q. It includes that the student has</p> <p>10 been struggling with the death of a female</p> <p>11 friend, girlfriend, in May 2022, right?</p> <p>12 A. Yes.</p> <p>13 Q. It also includes near the bottom of</p> <p>14 the page that they were having trouble getting</p> <p>15 access to insurance for mental health services</p> <p>16 because of difficulties locating a Social</p> <p>17 Security Number, right?</p> <p>18 A. Correct.</p> <p>19 Q. And any one of those factors</p> <p>20 individually could cause a child to struggle</p> <p>21 with mental health, right?</p> <p>22 A. Yes.</p> <p>23 Q. Those factors could cause them to</p> <p>24 have disrupted learning, right?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 343</p> <p>1 district, social media is used for photographs</p> <p>2 with school violence threats, yes.</p> <p>3 Q. Those are photographs posted by</p> <p>4 students, right, content posted by students?</p> <p>5 MR. CUTLER: Object to form.</p> <p>6 THE WITNESS: Correct.</p> <p>7 BY MS. DEGTAREVA:</p> <p>8 Q. I'm going to switch gears and talk</p> <p>9 about another topic.</p> <p>10 MS. DEGTAREVA: Let's mark as</p> <p>11 Exhibit 41 tab 65.</p> <p>12 MR. RICE: I can print it.</p> <p>13 MS. DEGTAREVA: We'll come back to</p> <p>14 that one.</p> <p>15 MR. RICE: Sorry.</p> <p>16 BY MS. DEGTAREVA:</p> <p>17 Q. Ms. Shivanonda, you became director</p> <p>18 of social emotional learning and development</p> <p>19 after the COVID-19 pandemic, right?</p> <p>20 A. It was September of 2021, so it was</p> <p>21 still current during the pandemic, yes.</p> <p>22 Q. Got it.</p> <p>23 Now, apart from being director of</p> <p>24 social emotional learning and development, do</p> <p>25 you have any other titles or responsibilities at</p>

<p style="text-align: right;">Page 344</p> <p>1 TUSD right now?</p> <p>2 A. Within that, so oversees the mental</p> <p>3 health supports, our school counseling</p> <p>4 department, as well as our substance abuse</p> <p>5 prevention program and department.</p> <p>6 Q. And have you ever served as a</p> <p>7 counselor at TUSD or anywhere else?</p> <p>8 A. In previous roles. Not as a</p> <p>9 certified school counselor, but as a behavior</p> <p>10 support and instructional coach, I would be used</p> <p>11 as a support staff that could provide counseling</p> <p>12 to students, yes.</p> <p>13 Q. Have you ever served -- in that role</p> <p>14 would you have considered yourself a mental</p> <p>15 health professional?</p> <p>16 A. School based so it would be</p> <p>17 different. Not necessarily clinically trained,</p> <p>18 but school-based mental health professional</p> <p>19 within the realm of school, yes.</p> <p>20 Q. Do you have any education in mental</p> <p>21 health?</p> <p>22 A. My degree, I have a bachelor's in</p> <p>23 elementary education, a master's in elementary</p> <p>24 education, and a master's in school</p> <p>25 administration. Within that formal education we</p>	<p style="text-align: right;">Page 346</p> <p>1 adolescent psychologist?</p> <p>2 A. Correct.</p> <p>3 Q. Now, the director of social</p> <p>4 emotional learning, that was a new position that</p> <p>5 TUSD created when you took it on, right?</p> <p>6 A. Correct.</p> <p>7 Q. Was the entire department new?</p> <p>8 A. The school counseling department was</p> <p>9 not new, but it was moved under my direction.</p> <p>10 Q. And TUSD created that position of</p> <p>11 director of social emotional learning to help</p> <p>12 students transition back to school after the</p> <p>13 pandemic, right?</p> <p>14 A. The creation of the department was</p> <p>15 for a multitude of reasons. The main focus was</p> <p>16 in providing social emotional mental health</p> <p>17 resources and supports for students as we</p> <p>18 identified that there was a need that then, yes,</p> <p>19 was identified that was exacerbated from the</p> <p>20 pandemic.</p> <p>21 Q. Now, I'd like to play a video clip.</p> <p>22 This is tab 3A. And let's -- you can start from</p> <p>23 the beginning and play until the second -- 36</p> <p>24 second mark.</p> <p>25 MR. CUTLER: Is this an exhibit?</p>
<p style="text-align: right;">Page 345</p> <p>1 do touch on adolescent and child development</p> <p>2 with regards to mental health.</p> <p>3 And then I have also done quite a</p> <p>4 bit of research and training outside of that on</p> <p>5 my own around trauma informed practices and</p> <p>6 current mental health practices, yes.</p> <p>7 Q. Do you have any education in</p> <p>8 psychology?</p> <p>9 A. Outside of my bachelor's and</p> <p>10 master's degrees, no. I did Psychology 101 as</p> <p>11 part of my bachelor's degree.</p> <p>12 Q. How about any education in</p> <p>13 psychiatry?</p> <p>14 A. No official education in psychiatry.</p> <p>15 However, as a parent of a child on the autism</p> <p>16 spectrum, I spent 12 years with an adolescent</p> <p>17 psychologist, and then self-taught and</p> <p>18 researched to support the needs of my own child.</p> <p>19 Q. And when you say you "spent 12 years</p> <p>20 with an adolescent psychologist," you mean you</p> <p>21 were working with somebody trained as an</p> <p>22 adolescent psychologist, right?</p> <p>23 A. Yes. Working with and supporting my</p> <p>24 son's psychiatrist, yes.</p> <p>25 Q. So you yourself are not an</p>	<p style="text-align: right;">Page 347</p> <p>1 MS. DEGTYAREVA: Yes. I'll mark</p> <p>2 that as Exhibit 41. Here is a slipsheet.</p> <p>3 (Tucson-30(b)(6)-Shivanonda-41 was</p> <p>4 marked for identification.)</p> <p>5 BY MS. DEGTYAREVA:</p> <p>6 Q. While we're waiting for that to come</p> <p>7 up, I'll represent to you that this is a video</p> <p>8 from YouTube.</p> <p>9 (Video clip played.)</p> <p>10 Q. So this is you in the video?</p> <p>11 A. It is.</p> <p>12 Q. And in the video you say that social</p> <p>13 emotional learning is about developing skills</p> <p>14 and building healthy relationships, is that</p> <p>15 right?</p> <p>16 A. Among other things, yes.</p> <p>17 Q. Some of the other things you mention</p> <p>18 are responsible decision-making, right?</p> <p>19 A. Correct.</p> <p>20 Q. And you also mentioned showing</p> <p>21 empathy towards one another?</p> <p>22 A. Yes.</p> <p>23 Q. Now, in that clip we just played,</p> <p>24 when you talked about social emotional learning,</p> <p>25 you didn't describe it as combatting the impact</p>



<p style="text-align: right;">Page 348</p> <p>1 of social media, right?</p> <p>2 MR. CUTLER: Object to form.</p> <p>3 THE WITNESS: I did not. I also did</p> <p>4 not explain it as combatting the COVID</p> <p>5 pandemic either.</p> <p>6 BY MS. DEGTYAREVA:</p> <p>7 Q. So you didn't say the word "social</p> <p>8 media" in that clip, right?</p> <p>9 A. No.</p> <p>10 Q. And the resources that are provided</p> <p>11 by the social emotional learning department are</p> <p>12 available to all students, right?</p> <p>13 A. Correct.</p> <p>14 Q. So they're available to students</p> <p>15 regardless of whether or not they use social</p> <p>16 media?</p> <p>17 A. Yes.</p> <p>18 MS. DEGTYAREVA: Can we go to minute</p> <p>19 2 at 23 seconds?</p> <p>20 (Video clip played.)</p> <p>21 MS. DEGTYAREVA: You can stop it</p> <p>22 there.</p> <p>23 BY MS. DEGTYAREVA:</p> <p>24 Q. So during the pandemic you would</p> <p>25 agree it was tough on students and teachers to</p>	<p style="text-align: right;">Page 350</p> <p>1 around the adoption of curriculum.</p> <p>2 Q. And was this a presentation to the</p> <p>3 TUSD's governing board?</p> <p>4 A. Yes.</p> <p>5 Q. Were you one of the -- you're listed</p> <p>6 on the page -- on the front page you were listed</p> <p>7 here. Were you one of the people who gave this</p> <p>8 presentation?</p> <p>9 A. Yes.</p> <p>10 Q. So this was a presentation regarding</p> <p>11 the social emotional learning curriculum</p> <p>12 adoption, right?</p> <p>13 A. Yes.</p> <p>14 Q. From December 7th, 2021?</p> <p>15 A. Yes.</p> <p>16 Q. If you turn to the first slide, it's</p> <p>17 labeled Purpose and Scope of Work.</p> <p>18 Do you see that?</p> <p>19 A. I do.</p> <p>20 Q. So this slide describes the purpose</p> <p>21 and the scope of work of the social emotional</p> <p>22 learning curriculum, right?</p> <p>23 A. Yes.</p> <p>24 Q. Neither of the two paragraphs on</p> <p>25 this slide mention the word "social media,"</p>
<p style="text-align: right;">Page 349</p> <p>1 have instruction online?</p> <p>2 A. Yes.</p> <p>3 Q. It was tough on students and</p> <p>4 teachers in terms of connectedness?</p> <p>5 A. Yes.</p> <p>6 Q. And after the pandemic students had</p> <p>7 to relearn how to be connected to their peers?</p> <p>8 A. Yes.</p> <p>9 Q. After the pandemic students had to</p> <p>10 relearn how to be -- how to just be in a space</p> <p>11 with a lot of other people, right?</p> <p>12 A. Correct.</p> <p>13 Q. And after the pandemic students had</p> <p>14 to relearn how to have respectful conversations?</p> <p>15 A. Yes.</p> <p>16 Q. And teachers also had to reacclimate</p> <p>17 to being back on campus after the pandemic?</p> <p>18 A. Yes.</p> <p>19 MS. DEGTYAREVA: Okay. Let's mark</p> <p>20 as Exhibit 42 tab 48.</p> <p>21 (Tucson-30(b)(6)-Shivanonda-42 was</p> <p>22 marked for identification.)</p> <p>23 BY MS. DEGTYAREVA:</p> <p>24 Q. Are you familiar with this document?</p> <p>25 A. This looks like, yes, a presentation</p>	<p style="text-align: right;">Page 351</p> <p>1 right?</p> <p>2 A. Correct.</p> <p>3 Q. And if you go to the next page,</p> <p>4 under OBJECTIVES, that slide describes the</p> <p>5 objectives of the social emotional learning</p> <p>6 curriculum, right?</p> <p>7 A. Yes.</p> <p>8 Q. And none of the bullets on this</p> <p>9 slide mention social media, right?</p> <p>10 A. Not explicitly, no. This alludes to</p> <p>11 online support, but yes.</p> <p>12 Q. It alludes to receiving crisis</p> <p>13 support online, right?</p> <p>14 A. Crisis support and then other</p> <p>15 instructional practices online connected, yes.</p> <p>16 Q. Now, if you go to page 3, that talks</p> <p>17 about Functions to be supported by curriculum,</p> <p>18 right?</p> <p>19 A. Yes.</p> <p>20 Q. So this slide talks about the</p> <p>21 functions that are supposed to be supported by</p> <p>22 the social emotional learning curriculum, right?</p> <p>23 A. Yes.</p> <p>24 Q. And this slide also does not mention</p> <p>25 social media, right?</p>

<p style="text-align: right;">Page 352</p> <p>1 A. This slide shows the targeted 2 support of the three tiers of support that we 3 provide, and then, "Tier 3-SEL education/support 4 for identifying groups needing more than Tier 2, 5 with a strong focus on intervention." 6 So within this presentation it's 7 difficult to outline and call out all of the 8 components of why we need social emotional 9 learning curriculum, but one of the reasons that 10 we do is also connected to social emotional 11 learning and our staff being able to provide 12 that higher level one-on-one and small group of 13 students to support their overall well-being, 14 which again connects to -- one of the facets of 15 it is through social media. 16 Q. Ms. Shivanonda, this slide does not 17 mention social media, right? 18 A. Not explicitly, no. 19 Q. And then if you go not to the next 20 page, but the page after that where it says 21 Recommendation. 22 A. Yes. 23 Q. So this page discusses the adoption 24 of the Character Strong curriculum, right? 25 A. Correct.</p>	<p style="text-align: right;">Page 354</p> <p>1 do you see any mention of social media in this 2 document? 3 (Witness reviewing document.) 4 A. It does not explicitly name social 5 emotion -- or, I'm sorry, social media. It does 6 discuss all of the skills needed to succeed in 7 school and in life, as well as a comprehensive 8 approach to the social emotional growth of 9 students. 10 And so, again, back to our data 11 knowing that the social media impact directly 12 impacts the social emotional growth of students, 13 and so as part of that comprehensive approach it 14 does include data around social emotional 15 learning. 16 Q. Ms. Shivanonda, this document 17 nowhere mentions social media, right? 18 A. Not explicitly, no. 19 MR. CUTLER: Object to form. Asked 20 and answered. 21 BY MS. DEGTAREVA: 22 Q. Now, the social emotional learning 23 department has a handbook that outlines the 24 department's goals, right? 25 A. Correct.</p>
<p style="text-align: right;">Page 353</p> <p>1 Q. And again this slide does not 2 mention social media? 3 A. Correct. 4 Q. In fact, nowhere in this 5 presentation is there a mention of social media, 6 right? 7 A. Correct. 8 MS. DEGTAREVA: Okay. So let's 9 mark as Exhibit 43 tab 49. 10 (Tucson-30(b)(6)-Shivanonda-43 was 11 marked for identification.) 12 BY MS. DEGTAREVA: 13 Q. Ms. Shivanonda, is this the job 14 description for the director of social emotional 15 learning position? 16 A. It is. 17 Q. And if you look at the metadata 18 sheet, the date modified is listed as 4/28/2021, 19 right? 20 A. Yes. 21 Q. So that was around the time that 22 TUSD added this position? 23 A. Correct. 24 Q. Now, if you go to the -- actually, 25 if you just take a moment to read the document,</p>	<p style="text-align: right;">Page 355</p> <p>1 MS. DEGTAREVA: Let's mark as 2 Exhibit 44 tab 5A. 3 (Tucson-30(b)(6)-Shivanonda-44 was 4 marked for identification.) 5 BY MS. DEGTAREVA: 6 Q. Ms. Shivanonda, is this the handbook 7 of the Social Emotional Learning department? 8 A. It, yes, appears to be a printout of 9 this digital handbook, yes. 10 Q. Let's take a look at the second page 11 of the document which ends in Bates 571, and do 12 you see at the top it says Mission? 13 A. Mm-hmm. 14 Q. Can you please read the mission? 15 A. "The mission of the Social Emotional 16 Learning and Development Department is to 17 establish a culture and climate for students, 18 families, and staff that supports and nurtures 19 relationships, self-awareness, inclusion, and 20 resilience." 21 Q. And, again, this mission statement 22 does not say anything about social media? 23 A. It does not. 24 MS. DEGTAREVA: Let's mark as 25 Exhibit 45 tab 6A.</p>

<p style="text-align: right;">Page 356</p> <p>1 (Tucson-30(b)(6)-Shivanonda-45 was 2 marked for identification.) 3 BY MS. DEGTYAREVA: 4 Q. If you take a look at Exhibit 45, 5 take a look at the metadata slipsheet, you'll 6 see you listed as a custodian, right? 7 A. Yes. 8 Q. And the File Name is SEL for 9 Parents, right? 10 A. Yes. 11 Q. So is this a handout that you've 12 sent to parents about the social emotional 13 learning? 14 A. It is one. Yes, it's one resource 15 that we do provide, and it is part of our 16 district website. 17 Q. Now, at the top you describe social 18 emotional learning as "the process through which 19 all young people and adults acquire and apply 20 the knowledge, skills, and attitudes to develop 21 the following crucial competencies:" 22 Right? 23 A. Yes. 24 Q. And the competencies you list are, 25 "Making Responsible and Caring Decisions."</p>	<p style="text-align: right;">Page 358</p> <p>1 We are also finding that these 2 skills are even more important for the students 3 that use social media because we are finding a 4 lack of ability of students to be able to make 5 responsible and caring decisions as a result of 6 their exposure to social media. 7 Q. And then right below that you 8 include a section telling families how they can 9 help, right? 10 A. Yes. 11 Q. So these are ways in which parents 12 can support their students in social and 13 emotional learning? 14 A. Yes. 15 Q. And the things you list are, "Ask 16 your child how they feel about school." 17 Right? 18 A. Yes. 19 Q. "As a family, engage in 20 conversations about empathy, kindness, and 21 respect." 22 Right? 23 A. Yes. 24 Q. "Model empathy, kindness, and 25 respect at home and in the community."</p>
<p style="text-align: right;">Page 357</p> <p>1 Right? 2 A. Yes. 3 Q. "Achieving Personal and Collective 4 Goals." 5 Right? 6 A. Yes. 7 Q. "Establishing and Maintaining 8 Supportive Relationships"? 9 A. Yes. 10 Q. "Feeling and Showing Empathy for 11 Others"? 12 A. Yes. 13 Q. "Healthy Identities"? 14 A. Yep. 15 Q. And "Managing Emotions." 16 Right? 17 A. Yes. 18 Q. These are skills that are important 19 for all young people and adults, right? 20 A. Correct. 21 Q. These are not skills that are only 22 for people who use social media? 23 A. These are skills for all -- yes, for 24 all students and adults alike, whether or not 25 they use social media or not.</p>	<p style="text-align: right;">Page 359</p> <p>1 Yes? 2 A. Yes. 3 Q. "Help your child find ways to 4 regulate when they are feeling upset. Get some 5 water. Take a break. Go for a walk. Take deep 6 breaths. Listen to music." 7 Right? 8 A. Yes. 9 Q. And then, Check out the SEL 10 Resources on the TUSD Social Emotional Learning 11 Website. 12 Right? 13 A. Yes. 14 Q. So this handout doesn't tell 15 parents, Limit your children's phone use, right? 16 A. It does not. 17 Q. It doesn't tell parents, Don't let 18 your children use social media, right? 19 A. Not explicitly. It gives ways of 20 coping without the use of social media. 21 Q. Okay. This handout does not say, 22 Don't let your children use social media, right? 23 A. Correct. 24 Q. And it actually suggests that 25 parents can use some online apps with their</p>

<p style="text-align: right;">Page 360</p> <p>1 children on the second page ending in 753, 2 right? 3 A. It does. 4 Q. There's some self-regulation apps 5 that are suggested here? 6 A. There are many apps available that 7 can support, and so leveraging the resources 8 that are already in the community can be 9 helpful, yes. 10 Q. And those are apps that children 11 could access on their cellphones and mobile 12 devices, right? 13 A. Correct. 14 MR. CUTLER: Object to form. 15 BY MS. DEGTAREVA: 16 Q. Now, let's turn and look a little 17 bit more at the curriculum that TUSD uses for 18 social emotional learning. Is that called 19 Character Strong? 20 A. It is. 21 MS. DEGTAREVA: Let's mark as 22 Exhibit 46 tab 7A. 23 (Tucson-30(b)(6)-Shivanonda-46 was 24 marked for identification.) 25 ///</p>	<p style="text-align: right;">Page 362</p> <p>1 Q. And this implementation plan does 2 not include -- or does not state that one of the 3 things to be done is eliminating, reducing, or 4 preventing social media use, right? 5 MR. CUTLER: Object to form. 6 THE WITNESS: Correct. And I don't 7 believe this is the full document, but at 8 face value it does not. 9 BY MS. DEGTAREVA: 10 Q. And this document doesn't say -- 11 doesn't say anything about educating students 12 about social media use? 13 A. There is explicit instruction 14 focused on the competencies of SEL, and part of 15 the Character Strong curriculum there are 16 specific lessons that are around social media 17 use which also supports self-management, 18 responsible decision-making, social awareness, 19 but it does not explicitly state social media. 20 Q. Now, this curriculum, Character 21 Strong, that includes self-awareness, 22 self-management, responsible decision-making, 23 social awareness and relationship skills. 24 That's not limited to students who use social 25 media, right?</p>
<p style="text-align: right;">Page 361</p> <p>1 BY MS. DEGTAREVA: 2 Q. So this is labeled the Social and 3 Emotional Learning Implementation School Year 4 2023-2024, Elementary/K8 Schools, right? 5 A. Correct. 6 Q. And this memo explains at the top in 7 the second paragraph, "All schools will 8 implement a Social Emotional Wellbeing Framework 9 to support the social emotional wellbeing of all 10 school stakeholders and to develop a positive 11 climate and school culture." 12 Right? 13 A. Yes. 14 Q. It includes some implementation 15 logistics, right? 16 A. Yes. 17 Q. And so that's "Welcoming Routines," 18 "Building Community," "Teaching and Learning," 19 "Optimistic Closure," and "Timely and Equitable 20 Interventions," right? 21 A. Yes. 22 Q. And then it also lists "Positive 23 Behavior Interventions and Support Program," 24 right? 25 A. Yes.</p>	<p style="text-align: right;">Page 363</p> <p>1 A. Correct. That is for all students. 2 Q. And you've actually used social 3 media as a way to promote social emotional 4 learning, right? 5 A. We do. Again, we try all of our 6 different ways to connect with the community, 7 and that is what the community regularly uses so 8 we do to promote ongoing awareness, yes. 9 MS. DEGTAREVA: So let's mark as 10 Exhibit 47 tab 8A. 11 (Tucson-30(b)(6)-Shivanonda-47 was 12 marked for identification.) 13 BY MS. DEGTAREVA: 14 Q. This is a flyer about International 15 SEL Day, right? 16 A. Yes. 17 Q. And it's called a Toolkit Pre-K - 18 5th, right? 19 A. Yes. 20 Q. So this is a toolkit of activities 21 that can be used with prekindergarten through 22 5th grade students, right? 23 A. Correct. 24 Q. Some of the things that it suggests 25 are making an announcement in class about social</p>

<p style="text-align: right;">Page 364</p> <p>1 emotional learning, right?</p> <p>2 A. Yes.</p> <p>3 Q. Playing a game that involves social</p> <p>4 emotional learning?</p> <p>5 A. Correct.</p> <p>6 Q. Reading a book about social</p> <p>7 emotional learning, right?</p> <p>8 A. Yes.</p> <p>9 Q. And then it lists some book</p> <p>10 suggestions on YouTube, right? At the bottom</p> <p>11 under "Childrens' Books Kindness" it says</p> <p>12 "YouTube"?</p> <p>13 A. Yes.</p> <p>14 Q. And then if you look down to -- it's</p> <p>15 a little bit hard to see on the printed copy,</p> <p>16 it's a little easier to see on the electronic,</p> <p>17 but where it says Share Your SEL!, it says,</p> <p>18 "Post on social media #selday."</p> <p>19 Right?</p> <p>20 A. Correct.</p> <p>21 Q. Then at the top of this document</p> <p>22 where it says Need more ideas?, it recommends</p> <p>23 that students and families check out TUSD's</p> <p>24 Pinterest page, right?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 366</p> <p>1 curriculum that the social emotional learning</p> <p>2 department uses. Character Strong itself uses</p> <p>3 social media, right?</p> <p>4 A. They do.</p> <p>5 MS. DEGTAREVA: So let's mark as</p> <p>6 Exhibit 49 tab 30A.</p> <p>7 (Tucson-30(b)(6)-Shivanonda-49 was</p> <p>8 marked for identification.)</p> <p>9 BY MS. DEGTAREVA:</p> <p>10 Q. Ms. Shivanonda, this is a printout</p> <p>11 from the Character Strong Facebook account,</p> <p>12 right?</p> <p>13 MR. CUTLER: Objection. Form,</p> <p>14 foundation.</p> <p>15 THE WITNESS: That is what this</p> <p>16 printout looks like, yes.</p> <p>17 BY MS. DEGTAREVA:</p> <p>18 Q. And at least at the time that this</p> <p>19 was printed, Character Strong had 15,000</p> <p>20 followers on Facebook?</p> <p>21 A. That is what it says, yes.</p> <p>22 Q. And Character Strong posts content</p> <p>23 on its Facebook account, right?</p> <p>24 A. Correct. They post content around</p> <p>25 social emotional learning practices, yes.</p>
<p style="text-align: right;">Page 365</p> <p>1 MS. DEGTAREVA: Now let's mark as</p> <p>2 exhibit 48 tab 9A.</p> <p>3 (Tucson-30(b)(6)-Shivanonda-48 was</p> <p>4 marked for identification.)</p> <p>5 BY MS. DEGTAREVA:</p> <p>6 Q. This is very similar to the document</p> <p>7 we just looked at, right? It's again about</p> <p>8 International SEL Day?</p> <p>9 A. Correct. And this is for 6th</p> <p>10 through 12th grade.</p> <p>11 Q. Right, 6th through 12 grade.</p> <p>12 So this document contains some</p> <p>13 toolkit and suggestions that can be used with</p> <p>14 6th through 12th grade students, right?</p> <p>15 A. Correct.</p> <p>16 Q. And if you go down to the bottom</p> <p>17 where it says Share Your SEL!, it says, "Post on</p> <p>18 social media #selday."</p> <p>19 Right?</p> <p>20 A. Correct.</p> <p>21 As part of the SEL movement across</p> <p>22 the world actually we are focusing on more</p> <p>23 awareness to support knowing that it is such a</p> <p>24 need.</p> <p>25 Q. Now, Character Strong is a</p>	<p style="text-align: right;">Page 367</p> <p>1 They're also a business and a company, so they</p> <p>2 are utilizing this as -- it's a marketing tool.</p> <p>3 Q. And this is the curriculum that the</p> <p>4 social emotional learning department at TUSD</p> <p>5 uses?</p> <p>6 A. Correct.</p> <p>7 MS. DEGTAREVA: Now let's mark as</p> <p>8 Exhibit 50 tab 31A.</p> <p>9 (Tucson-30(b)(6)-Shivanonda-50 was</p> <p>10 marked for identification.)</p> <p>11 BY MS. DEGTAREVA:</p> <p>12 Q. Ms. Shivanonda, this is a printout</p> <p>13 of the Character Strong Instagram account,</p> <p>14 right?</p> <p>15 MR. CUTLER: Objection. Form,</p> <p>16 foundation.</p> <p>17 THE WITNESS: That is what this</p> <p>18 printout seems to show, yes.</p> <p>19 BY MS. DEGTAREVA:</p> <p>20 Q. And again, at the time that this was</p> <p>21 printed out, it showed that Character Strong had</p> <p>22 13,000 followers, right?</p> <p>23 A. Yes.</p> <p>24 Q. 1,372 posts, right?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 368</p> <p>1 MS. DEGTYAREVA: And then let's mark 2 as Exhibit 51 tab 32A. 3 (Tucson-30(b)(6)-Shivanonda-51 was 4 marked for identification.) 5 BY MS. DEGTYAREVA: 6 Q. And this is a printout of the 7 Character Strong TikTok page, right? 8 MR. CUTLER: Objection. Form, 9 foundation. 10 THE WITNESS: That is what this 11 looks like. 12 BY MS. DEGTYAREVA: 13 Q. Okay. So Character Strong again 14 posts videos on its TikTok page? 15 A. I guess they do. 16 Q. And at the time that this was 17 printed out it shows that they had 1,000 18 followers? 19 A. Yes. 20 Q. You can set that aside. 21 Ms. Shivanonda, have you ever spoken 22 with a representative of any of the defendants 23 about any features on their platforms? 24 A. I have not directly spoken to any of 25 the defendants about their platform, no.</p>	<p style="text-align: right;">Page 370</p> <p>1 have we directly communicated with social 2 media companies to remove any components 3 of their platform. 4 MS. DEGTYAREVA: Can we take a quick 5 break to print the document? Unless you 6 want to use it just electronically, if you 7 want to do as well? 8 MR. CUTLER: Electronically is fine 9 with me. 10 MR. RICE: That's 65. 11 MS. DEGTYAREVA: Tab 65? 12 MR. RICE: Yes. 13 MS. DEGTYAREVA: So let's mark as 14 Exhibit 52 tab 65. 15 (Tucson-30(b)(6)-Shivanonda-52 was 16 marked for identification.) 17 MR. CUTLER: How many pages is this? 18 THE VIDEOGRAPHER: Six. 19 MR. CUTLER: Take your time to read 20 it, and just let him know when you want to 21 change to the next page. Or do you want 22 to start at the bottom? 23 THE WITNESS: Can we start at the 24 bottom? That's how e-mail correspondence 25 works.</p>
<p style="text-align: right;">Page 369</p> <p>1 Q. Have you ever requested that any one 2 of the defendants discontinue a particular 3 feature on the platform? 4 A. I directly in personal use have 5 reported what appeared to be scam or fake 6 profiles. I know as the district when there are 7 instances of social media being used in a 8 nefarious way, there has been communication 9 about asking to remove certain posts, and those 10 are not always followed through. 11 To my knowledge, I do not know that 12 the district has engaged any direct 13 conversations with social media platforms. 14 Q. So you in your personal capacity and 15 then also the district have asked social media 16 companies to remove content that you thought was 17 inappropriate, right? 18 A. Correct. 19 Q. Have you ever requested any of the 20 defendants to modify features such as getting 21 rid of the ability to comment on content or 22 getting rid of the ability to like content? 23 MR. CUTLER: Objection. Form, 24 foundation. 25 THE WITNESS: Not to my knowledge</p>	<p style="text-align: right;">Page 371</p> <p>1 THE VIDEOGRAPHER: Do you want the 2 slipsheet? 3 THE WITNESS: No, that's fine. 4 Okay. You can scroll. 5 Okay. You can scroll. 6 (Witness reviewing document.) 7 THE WITNESS: Okay. 8 Okay. 9 Okay. 10 BY MS. DEGTYAREVA: 11 Q. Are you ready, Ms. Shivanonda? 12 A. I am. 13 Q. Okay. Let's take a look at the page 14 ending in Bates 116. 15 A. Okay. 16 Q. Now, at the bottom there's an e-mail 17 from you to Fina Johnson on May 24, 2024, right? 18 A. Yes. 19 Q. Who is Fina Johnson? 20 A. Fina Johnson is the director of 21 finance for TUSD. 22 Q. And in this e-mail you say, "The 23 project for utilizing the JUUL grants fund that 24 was approved by the GB is being transferred to 25 the Social Emotional Learning Department (DAC</p>



<p style="text-align: right;">Page 372</p> <p>1 5023) to implement a new model in the district.  2 The approved project will utilize the funds to  3 create seven (7) new positions, procure  4 curriculum, and provide training for the newly  5 created positions."  6 Do you see that?  7 A. I do.  8 Q. What are the JUUL grants funds?  9 A. The JUUL grant funds is the monetary  10 funding that was awarded to the district from  11 the JUUL litigation.  12 Q. And here are you requesting that the  13 JUUL -- that the money that is awarded from the  14 JUUL litigation be transferred to the social  15 emotional learning department?  16 A. Yes. So when the funding was  17 originally provided to the district, it went  18 through the legal department, and then as we  19 collaborated around how to utilize the funds and  20 create the new initiatives, it was decided with  21 that stakeholder group that it would be my  22 department that would oversee the programming,  23 and so this was the request to ensure that the  24 budget was in the correct department budget.  25 Q. And so this request for utilizing</p>	<p style="text-align: right;">Page 374</p> <p>1 THE VIDEOGRAPHER: Counsel on Zoom,  2 if you are speaking, you're muted.  3 You're still muted. I don't know if  4 anybody is trying to speak.  5 MR. MADISON: I didn't hear.  6 THE VIDEOGRAPHER: We can hear you  7 now.  8 MR. MADISON: Okay.  9 EXAMINATION  10 BY MR. MADISON:  11 Q. Good afternoon, Ms. Shivanonda. I'm  12 Armani Madison, a lawyer appearing from Williams  13 &amp; Connolly on behalf of Defendant YouTube. I'm  14 going to ask you a few questions.  15 So you confirmed yesterday that one  16 of the topics you are prepared to discuss is  17 Topic 7, is that correct? I'll direct you back  18 to Exhibit 1, which, if you have that with you,  19 pull it out.  20 A. So line 7?  21 Q. Topic 7.  22 A. Under Deposition Topics?  23 Q. Yes.  24 A. Okay.  25 Q. So you see Topic 7 there?</p>
<p style="text-align: right;">Page 373</p> <p>1 the JUUL grant funds to be transferred to the  2 social emotional learning department, that was  3 approved by the governing board?  4 A. Correct.  5 Q. So then were those funds used to  6 create seven new positions in your department?  7 A. Yes, correct.  8 Q. And to procure curriculum for the  9 social emotional learning department?  10 A. We are in the process of procuring  11 the curriculum now, yes.  12 Q. And so were those JUUL settlement  13 funds also used to provide training for the  14 newly created positions?  15 A. Yes.  16 Q. Just one moment.  17 MS. DEGTYAREVA: So subject to any  18 questions from your counsel, I have  19 nothing further.  20 I believe there might be some  21 questions from the Zoom. So maybe we can  22 take just a quick break to see if the Zoom  23 wants to chime in.  24 MR. CUTLER: If somebody wants to  25 chime in, they're welcome to.</p>	<p style="text-align: right;">Page 375</p> <p>1 A. Yes.  2 Q. And you confirmed that's one of the  3 topics that you are prepared to discuss?  4 A. Yes.  5 Q. Okay. All right. So are you  6 familiar with something called Google Workspace  7 for Education?  8 A. I am aware of it. I don't have a  9 whole lot of knowledge around it, but I am aware  10 of it, yes.  11 Q. Okay. So if I refer to is as GWFE,  12 you'll understand that I'm referring to Google  13 Workspace for Education?  14 MR. CUTLER: As what?  15 THE WITNESS: If you refer to it as  16 what?  17 BY MR. MADISON:  18 Q. I'll just refer to it by the full  19 name.  20 A. Okay.  21 Q. All right. So you say you're  22 vaguely familiar with Google Workspace for  23 Education, correct?  24 A. Correct.  25 Q. What is your understanding of what</p>

<p style="text-align: right;">Page 376</p> <p>1 that is?</p> <p>2 A. So understanding that Google does</p> <p>3 have a suite of resources for education, TUSD,</p> <p>4 we are primarily a Microsoft district so the</p> <p>5 majority of our platforms that we use are</p> <p>6 Microsoft in nature. We have a handful of</p> <p>7 schools that may utilize Google Workspace.</p> <p>8 There are some free Google platforms</p> <p>9 that we have used in the past, Jamboard, Google</p> <p>10 Drive, Google Classroom. Again, those are some</p> <p>11 of the resources that may be used in our</p> <p>12 district; however, Microsoft is our main</p> <p>13 operating system that we use.</p> <p>14 Q. Okay. So Tucson as a district, did</p> <p>15 it ever use the freely available version of</p> <p>16 Google Workspace for Education?</p> <p>17 A. As a whole district endeavor, my</p> <p>18 understanding is that was not one of the main</p> <p>19 adopted resources to be used at the district</p> <p>20 level.</p> <p>21 Q. You say "main adopted." Do you know</p> <p>22 if Tucson ever used that at all?</p> <p>23 A. So across 90 schools, different</p> <p>24 schools may choose to use different resources</p> <p>25 that are available to them. However, as a</p>	<p style="text-align: right;">Page 378</p> <p>1 that was one of the videos shown today where the</p> <p>2 district uses the ability to make that private</p> <p>3 or internal and not necessarily public. I</p> <p>4 cannot speak to what individual schools have</p> <p>5 used on any semiregular basis.</p> <p>6 Q. And are you aware of whether any</p> <p>7 schools used Player for Education as an embedded</p> <p>8 player for YouTube videos?</p> <p>9 A. I am not familiar with that</p> <p>10 component of YouTube, no.</p> <p>11 Q. Okay. What is Tucson's current</p> <p>12 practice regarding student access to YouTube on</p> <p>13 school-issued devices?</p> <p>14 A. Students are able to access YouTube</p> <p>15 on school devices, but there are limited</p> <p>16 content-filtering features in place. So, and</p> <p>17 then that may change between students and staff.</p> <p>18 It is more restrictive for student use. But,</p> <p>19 however, there is still content filtering also</p> <p>20 for staff use with the use of YouTube as well.</p> <p>21 Q. Okay. So let's sort of take that</p> <p>22 step-by-step.</p> <p>23 So what restrictions are there for</p> <p>24 staff for YouTube?</p> <p>25 A. So staff are able to access YouTube</p>
<p style="text-align: right;">Page 377</p> <p>1 district there was no district board policy that</p> <p>2 Google Workspace was the main operating system</p> <p>3 being used in the district.</p> <p>4 Q. Okay. Do you know if Tucson ever</p> <p>5 purchased Google Workspace for Education?</p> <p>6 A. It is my understanding that the only</p> <p>7 contract that we were aware of was not any</p> <p>8 monetary in value, so it's my understanding -- I</p> <p>9 don't believe that any purchases have been made,</p> <p>10 outside of individual schools that may have</p> <p>11 purchased specific for use for their schools.</p> <p>12 Q. Okay. Are you aware of which</p> <p>13 schools would have purchased Google Workspace</p> <p>14 for Education?</p> <p>15 A. Not off the top of my head, no.</p> <p>16 Q. Okay. Are you aware that schools</p> <p>17 are able to use YouTube in managed Restricted</p> <p>18 Mode?</p> <p>19 A. Yes, I am aware.</p> <p>20 Q. Okay. Did Tucson use managed</p> <p>21 Restricted Mode for YouTube access at its</p> <p>22 schools?</p> <p>23 A. I believe in different instances. I</p> <p>24 know that our multimedia department will use</p> <p>25 YouTube to push out videos such as the video</p>	<p style="text-align: right;">Page 379</p> <p>1 for educational content. There may be content</p> <p>2 that may be searched for that may be blocked or</p> <p>3 prohibited based on keystroke searches, based on</p> <p>4 content filtering.</p> <p>5 Q. Okay. But you don't know whether --</p> <p>6 or do you know whether that's strict restricted,</p> <p>7 moderate restricted?</p> <p>8 A. That would be at the discretion of</p> <p>9 our technology services team, that they monitor</p> <p>10 the use and adjust as necessary.</p> <p>11 Q. And that's on a districtwide basis?</p> <p>12 A. Yes.</p> <p>13 Q. Schools don't have the individual --</p> <p>14 schools don't have the ability to change those</p> <p>15 restrictions, is that right?</p> <p>16 A. Correct, they do not.</p> <p>17 Q. Okay. And then restrictions for</p> <p>18 students, what restrictions for students was</p> <p>19 chosen for YouTube?</p> <p>20 A. Similar with the content filtering.</p> <p>21 So that is more -- to my understanding more</p> <p>22 strict content filtering for keystrokes. That</p> <p>23 -- again, the list of maybe content keystrokes</p> <p>24 and searching components would, again, live in</p> <p>25 our technology services department, and that</p>

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<p style="text-align: right;">Page 380</p> <p>1 gets updated on a fairly regular basis as they 2 identify what students may or may not be 3 searching. 4 Q. Okay. And so we discussed, you 5 know, student access to YouTube on school-issued 6 devices. Does Tucson have any different 7 practices when we talk about, you know, students 8 using devices on the school network? 9 A. If they use their personal devices? 10 Q. Yes. 11 A. So, again, the policies around the 12 use of student devices are that student devices 13 are not supposed to be used, especially during 14 instructional time, on school campuses. 15 Students are not able to access district-level 16 WIFI, but we do not have any ability to restrict 17 what students are able to access on their 18 personal devices. 19 Q. So from -- let's talk a bit briefly 20 about just the history of YouTube access at 21 Tucson. So I think you may have mentioned this. 22 From 2015 to present, has Tucson 23 ever blocked access to YouTube on either its 24 network or Tucson-provided devices? 25 A. Not that I am aware.</p>	<p style="text-align: right;">Page 382</p> <p>1 filtering, adjusting for proxy servers, all of 2 that at the district level in our technology 3 services department. 4 Q. And how is that usage being 5 monitored? Is there any particular software you 6 all were using, firewall? 7 A. We do our content filtering -- what 8 was it, Cisco? The name is eluding me. But, 9 yes, there is a content-filtering platform and 10 firewall that the district does use. 11 And I will say the firewall 12 component has also been updated quite a bit. 13 The district was involved in a cyber attack a 14 couple of years ago, and so that has 15 significantly impacted the response and the 16 analysis of how district-issued devices are 17 utilized. 18 Q. And tell me more about that. How 19 has that changed how those devices have been 20 utilized? 21 A. Since the cyber attack we have moved 22 forward with multifactor authorization and, from 23 my understanding, tightening up firewalls, being 24 more proactive in identifying potential attacks, 25 additional training for students and staff on</p>
<p style="text-align: right;">Page 381</p> <p>1 Q. Okay. And, again, you said from 2 2015 to present Tucson has allowed students and 3 staff to access YouTube in, you said, some form 4 of restricted mode? 5 A. Correct. 6 Q. And for students, were there 7 different restrictions based on what level of 8 school students were in, so elementary, middle, 9 high? 10 A. I don't believe so. I believe at 11 the district level, looking at the 12 content-filtering platforms and systems that we 13 use, it would be the overarching keystroke 14 content searching dependent upon keyword. 15 Q. Okay. And have those settings ever 16 been changed over that course of 2015 to 17 present? 18 A. The district does continuously 19 monitor and evaluate usage, and so, yes, on a 20 regular basis if they're identifying different 21 keywords, keystrokes, they are trying to be 22 responsive to how tricky kids can be in trying 23 to get around systems. 24 But, yes, they are always monitoring 25 and adjusting that, and adjusting for content</p>	<p style="text-align: right;">Page 383</p> <p>1 identifying malware, reducing the amount of USBs 2 being used on district devices, moving more 3 towards the cloud-based services, so again 4 Microsoft, so Microsoft drive -- OneDrive, 5 sorry. 6 Q. And you said -- just to make sure 7 I'm remembering correctly, you are saying that 8 the district has some issues with students using 9 VPNs to circumvent these filters? 10 A. No. Our district were -- the 11 district laptops are not enabled for students to 12 be able to download anything to district devices 13 or VPNs. 14 However, I do know that students are 15 very technology savvy and we do see high uses of 16 proxy servers that students are using to get 17 around different firewalls, and so our district 18 is very responsive. Whenever one proxy server 19 pops up, they shut that down, and so they're 20 constantly having to monitor and adjust. 21 Q. When students are using a proxy 22 server, are you able to see what websites they 23 are accessing through that proxy server? 24 A. So my understanding, so on our 25 Chromebook -- so the majority of K-8 students</p>

<p style="text-align: right;">Page 384</p> <p>1 are utilizing Chromebooks as their district 2 devices, and all of those Chromebooks do have a 3 software called GoGuardian, so the GoGuardian is 4 one of the tools that is used to be able to see 5 those websites. 6 I am not an expert on technology and 7 so I am not 100 percent sure what is able to be 8 gleaned from that data from proxy servers. That 9 would live in our technology services 10 department. 11 Q. And who exactly is -- in the 12 technology department would be most 13 knowledgeable about that? 14 A. My contact that I usually work with 15 is Tracey Rowley, senior director of 16 instructional technology. 17 Q. Okay. A few more questions here. 18 So you said that Tucson does permit 19 students and staff to use YouTube. Why does 20 Tucson allow access to YouTube? 21 A. For the educational content. 22 Q. So used for lesson plans, for 23 example? 24 A. To enhance, to bring in additional 25 content, to provide ongoing instructional</p>	<p style="text-align: right;">Page 386</p> <p>1 be a process of requesting presentations to the 2 governing board either for a study item or to 3 take action or consent on an initiative or a 4 need. 5 Q. Okay. And do you know when the 6 decision was made to allow access to YouTube? 7 A. I do not recall exactly that access. 8 I know YouTube has been used for some time. So 9 I do not know an exact date, no. 10 Q. When you say you don't know an exact 11 date, do you know an approximate date? 12 A. I do not. 13 Q. And to your knowledge, access is 14 still allowed for students and staff? 15 A. It is, on a limited basis, yes. 16 Q. Okay. I -- sorry, one second, make 17 sure -- see if I have any further questions for 18 you. 19 Do you know if Google requires that 20 Tucson get consent from parents to allow their 21 students to use YouTube? 22 A. Within our operating procedures, we 23 do require enrollment information from every 24 family every year. Acceptable use policy is 25 something that students and families are</p>
<p style="text-align: right;">Page 385</p> <p>1 practices. 2 The district also uses internally 3 YouTube for sharing out widely some of our 4 videos and information such as the video that we 5 saw today from my department. 6 Q. And sharing out content to students? 7 A. To students, staff, to parents. 8 Q. Okay. Do you know who made the 9 decision to allow students and staff to access 10 YouTube? 11 A. So that -- all of our practices and 12 policies in determining what may or may not be 13 allowable, that does go through a stakeholder 14 process including our school governing board, so 15 final say would be the school governing board. 16 Q. And how does that process operate? 17 A. So the -- depending upon the content 18 within the district, district departments are 19 tasked with analyzing and identifying the 20 resources needed, the practices needed within 21 district operations, and then would then elicit 22 feedback from senior leadership which would 23 include our assistant superintendents, our 24 superintendent. 25 And then as needed then there would</p>	<p style="text-align: right;">Page 387</p> <p>1 expected to sign. But it is my understanding 2 that instructional aids and practices are up to 3 the discretion of the district, and not all of 4 that would need parental consent. 5 Q. So I guess let me just ask another 6 way. 7 Do students -- does the school 8 district request consent from students and their 9 families to access YouTube? 10 A. Outside of the responsible use 11 policy, no. 12 Q. Okay. So it's only within the 13 responsible use policy? 14 A. Correct. And it's only used as an 15 instructional aid. 16 Q. And is this disseminated on a yearly 17 basis, a semesterly basis? 18 A. The responsible use policy is 19 something that is signed on a yearly basis. 20 Q. And when students and their families 21 are -- you know, when this is being sent out to 22 students and families, does the school provide 23 any warnings or information to parents about any 24 harms or potential harms that could be 25 associated with YouTube in particular?</p>

<p style="text-align: right;">Page 388</p> <p>1 A. Not that I'm aware of.</p> <p>2 Q. Okay. And the school district</p> <p>3 maintains records of these signed acceptable use</p> <p>4 policies?</p> <p>5 A. Yes.</p> <p>6 MR. MADISON: Okay. No further</p> <p>7 questions from me. Thank you,</p> <p>8 Ms. Shivanonda.</p> <p>9 THE WITNESS: Thank you.</p> <p>10 MS. DEGTYAREVA: Do you have</p> <p>11 anything?</p> <p>12 MR. CUTLER: Nothing from me.</p> <p>13 Anything further from the Zoom?</p> <p>14 MS. DEGTYAREVA: Ms. Shivanonda,</p> <p>15 thank you for your time.</p> <p>16 For the record, I will note that</p> <p>17 we're going to keep this deposition open.</p> <p>18 There were a variety of documents</p> <p>19 testified to today that Ms. Shivanonda</p> <p>20 relied on which were not produced before</p> <p>21 the deposition, and there were certain</p> <p>22 topics that Ms. Shivanonda was not</p> <p>23 prepared on, including Topic 5, Topics 19</p> <p>24 through 22, and Topic 32.</p> <p>25 MR. CUTLER: Clearly we don't agree</p>	<p style="text-align: right;">Page 390</p> <p>1 CERTIFICATE OF COURT REPORTER</p> <p>2</p> <p>3 I, MAUREEN O'CONNOR POLLARD,</p> <p>4 Registered Diplomat Reporter, CSR No. 14449 for</p> <p>5 the State of California, the officer before whom</p> <p>6 the foregoing deposition was taken, do hereby</p> <p>7 certify that the foregoing transcript is a true</p> <p>8 and correct record of the testimony given; that</p> <p>9 said testimony was taken by me stenographically</p> <p>10 and thereafter reduced to typewriting under my</p> <p>11 direction; and that I am neither counsel for,</p> <p>12 related to, nor employed by any of the parties</p> <p>13 to this case and have no interest, financial or</p> <p>14 otherwise, in its outcome.</p> <p>15 Dated this 9th day of April,</p> <p>16 2025.</p> <p>17</p> <p>18 <i>Maureen O. Pollard</i></p> <p>19 MAUREEN O'CONNOR POLLARD</p> <p>20 CSR No. 14449</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 389</p> <p>1 with that, but we'll talk about that.</p> <p>2 THE VIDEOGRAPHER: All right. This</p> <p>3 concludes today's deposition.</p> <p>4 Total time on the record for counsel</p> <p>5 for Snap for today is 3 hours and</p> <p>6 24 minutes. Counsel for YouTube was</p> <p>7 19 minutes.</p> <p>8 And we are going off record. The</p> <p>9 time is 2:03 p.m.</p> <p>10 (Whereupon, the deposition was</p> <p>11 adjourned.)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 391</p> <p>1 INSTRUCTIONS TO WITNESS</p> <p>2</p> <p>3 Please read your deposition over</p> <p>4 carefully and make any necessary corrections.</p> <p>5 You should state the reason in the appropriate</p> <p>6 space on the errata sheet for any corrections</p> <p>7 that are made.</p> <p>8 After doing so, please sign the</p> <p>9 errata sheet and date it. It will be attached</p> <p>10 to your deposition.</p> <p>11 It is imperative that you return</p> <p>12 the original errata sheet to the deposing</p> <p>13 attorney within thirty (30) days of receipt of</p> <p>14 the deposition transcript by you. If you fail</p> <p>15 to do so, the deposition transcript may be</p> <p>16 deemed to be accurate and may be used in court.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<div style="text-align: right; font-weight: bold;">Page 393</div> <div style="margin-top: 10px;"> <p>1       </p> <p>2       ACKNOWLEDGMENT OF DEPONENT</p> <p>3       </p> <p>4       I, _____, do</p> <p>5       Hereby certify that I have read the foregoing</p> <p>6       pages, and that the same is a correct</p> <p>7       transcription of the answers given by me to the</p> <p>8       questions therein propounded, except for the</p> <p>9       corrections or changes in form or substance, if</p> <p>10      any, noted in the attached Errata Sheet.</p> <p>11      </p> <p>12      _____</p> <p>13      WITNESS NAME       DATE</p> <p>14      </p> <p>15      </p> <p>16      Subscribed and sworn</p> <p>17      To before me this</p> <p>18      _____ day of _____, 20____.</p> <p>19      My commission expires: _____</p> <p>20      </p> <p>21      _____</p> <p>22      Notary Public</p> <p>23      </p> <p>24      </p> <p>25      </p> </div>	<div style="text-align: right; font-weight: bold;">Page 394</div> <div style="margin-top: 10px;"> <p>1       </p> <p>2       </p> <p>3       </p> <p>4       </p> <p>5       </p> <p>6       </p> <p>7       </p> <p>8       </p> <p>9       </p> <p>10      </p> <p>11      </p> <p>12      </p> <p>13      </p> <p>14      </p> <p>15      </p> <p>16      </p> <p>17      </p> <p>18      </p> <p>19      </p> <p>20      </p> <p>21      </p> <p>22      </p> <p>23      </p> <p>24      </p> <p>25      </p> </div>

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